

PUBLIC COMMENTS AND QUESTIONS
RELATED TO DVRPC BOARD ACTION ITEMS

September 24, 2020

Public comments on non-agenda items

From: John Butler

County: Delaware

Zip Code: N/A

Date Received: 09/13/2020

Comment/Question: Delcora is going to redirect sewerage now going to the plant at the Phila airport to the Chester plant where sludge is incinerated. Chester already has a poor air quality and is an EJ community. Phila has to upgrade their plant and it could become a biodigester plant creating RNG reducing carbon emissions. There are examples of sewerage treatment plants that did this. Also Phila has never addressed the loss of income now coming from Delco. Aqua buying delcro is not in the best interest with their long history of rate increases and little conservation measures to reduce sewage and water usage.

This is what the planning commission should be supporting for the Phila upgraded plant at the airport for the region. We don't need a larger plant in Chester which is a EJ community.

Increased burning of sewerage in Chester with NG will never get us to our carbon reduction targets. Also the phila steam loop and the energy coop is looking for RNG.



Response: Thank you for your comment. Your original comment was forwarded to the DVRPC Board. Sewage treatment is outside of DVRPC's domain but your comment was brought to the Board's Delaware County and Chester City representatives.

Your continued involvement and participation in the region's maintenance and developments is much appreciated.

From: Rev Glen Benson
County: Delaware
Zip Code: 19013
Date Received: 09/21/2020

Comment/Question: *PLEASE DISTRIBUTE ALL EMAILS TO THE DVRPC BOARD

Email 1 of 4

Date: Tue, Sep 22, 2020, 5:09 PM

Subject: Deliberate allowance of weed overgrowth by PENNDOT alongside of 1210 Kerlin Street, Chester, PA., 19013

To Whom It May Concern,

These pictures were taken from my rear bedroom window. As the pictures clearly demonstrate there is a deliberate ending of maintenance of the grass and weeds along I-95 leading up to the back of my property all the way to the front of Kerlin Street. This is racist to the core because the owner of the construction company is white where Penn Dot is still maintaining the lot.

It takes less than 15 seconds to say, "Dispatch a crew to cut the weeds on the lot along I-95 next to 1210 Kerlin Street in Chester ." It takes another 15 seconds to say, "Make sure that lot stays in the schedule to be maintained so the weed overgrowth does not get out of hand. " So, what is the delay?

I have to keep my front and backyard covered in tarp to try and keep those superweeds from the lot that PENNDOT owns blowing onto my property, yet they still manage to breakthrough. This deliberate racist treatment by PENNDOT is criminal in its intent. If it is not, then please explain to me what it is? I still await your response, and more so, your conscious actions.

Respectfully,
Rev. Glen Benson

Email 2 of 4

Date: Mon, Sep 21, 2020 at 10:26 AM

Subject: Fw: August 2020 1210 Kerlin Photos

To Whom It May Concern,

My name is Rev. Glen Benson and I am writing with regard to my home at 1210 Kerlin Street, Chester Pa. 19013. The man who does my yard work and cuts my grass

and keeps it clean has contracted Covid 19 and he has been very sick. Attached are pictures of my yard in August and how nice it always looks and how he keeps it. I am also sending in a separate email, pictures of how the weeds have overgrown in my yard because of PENNDOT intentionally not cutting the weeds in the vacant lot that PENNDOT owns next to my house. When PENNDOT does not cut the weeds on the property that PENNDOT owns, which is the vacant lot next to my house, then the blowback of those weeds affects not only my yard but my neighbor's yards all the way up the block. I am also sending copies of emails that I have sent to PENNDOT documenting that I have complained about this numerous times over the years before and this should not be a situation where I have to keep on asking PENNDOT to take care of their property. There will be a total of (3) separate emails addressing this situation. I should not have to consistently keep asking PENNDOT to cut the grass on the vacant lot that PENNDOT owns.

This is not something that would be experienced in a white neighborhood. It would not be tolerated on any level. This abuse demonstrates blatant institutionalized and systemic racism in a very clear form. That to PENNDOT if your neighborhood is Black, then Black neighborhoods do not matter. And it is beyond time to rectify that fact. I have appeared before the DVRPC board about this exact same situation, and PENNDOT officials have stated that they would see to it that the vacant lot next to 1210 Kerlin Street, Chester, PA. would be placed on a regular maintenance schedule. However, this is clearly not the case. Is this intentional neglect retaliation because I am once again asking for justice to have my home repaired from the violent traffic vibrations of I-95 that are shaking and destroying my house on a daily basis? Is this a retaliatory action because of the letters that I've written to PENNDOT official, Charles Davies, calling clarity to the racist action of PENNDOT stating that sound barriers would not be even considered to be placed in the area of 1210 Kerlin Street until 2027 and yet sound barriers abound in white neighborhoods? Whatever the case may be, I am calling on all the elected officials in Pennsylvania State Government, and all the officials at PENNDOT, and all the officials on the Board of DVRPC, to take action and bring justice to rectify this situation, because to remain silent and inactive speaks to being complicit and in agreement with these racist actions. I await your response, and more so, your conscious action.

Respectfully,
Rev. Glen Benson
1210 Kerlin Street
Chester, PA., 19013

Email 3 of 4

Transmitted to DVRPC on 9/21/2020

Sent: Tuesday, June 5, 2018 7:37 AM

Subject: Fw: Penndot Overgrown vacant lot next to 1210 Kerlin Street,

The lot next to my house looks like this right now , June 5, 2018. This is the same situation every year. I have called complaining to different individuals no less than ten times in the past week and a half, with no response. I would appreciate a response as to how this can be handled so I and my neighbors do not have to go through this process of begging Penn Dot to do what it is supposed to do on a regular routine basis. Or are we being neglected because this is a predominantly African American neighborhood? Is this consistent neglect based in racism and a purposeful racist act of neglect by Penn Dot? I await your response and action.

Respectfully,
Rev. Glen Benson

Email 4 of 4

Transmitted to DVRPC on 9/21/2020

Date: Mon, Sep 21, 2020 at 10:42 AM

Subject: Fw: PAST EMAILS TO PENNDOT REGARDING OVER GROWN WEEDS ON VACANT LOT OWNED BY PENNDOT

THIS IS THE THIRD EMAIL OF THIS GROUP CONCERNING THIS SITUATION AT 1210 KERLIN STREET, CHESTER, PA. 19013. PLEASE CONFIRM RECEIPT OF ALL EMAILS AND PICTURES. THANK YOU.

RESPECTFULLY,

REV. GLEN BENSON

Photos from emails

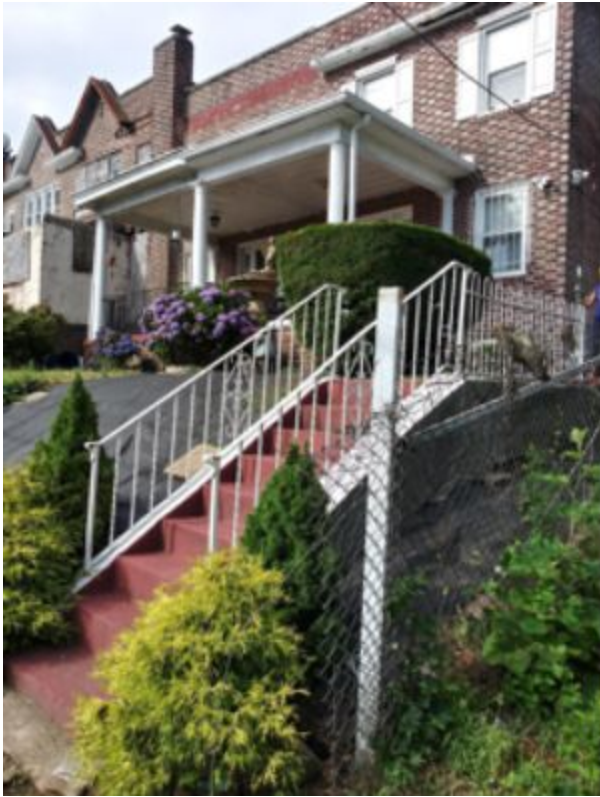
Following photos attached in 9/2//20 email







Following photos show Rev Benson's yard before the overgrown property:





The following photos show the weeds that have grown on Rev Glen Benson's property and in the adjacent lot:













Response: Thank you for your comment. Your original comment was forwarded to the DVRPC Board.

Response from Charles Davies, PennDOT sent via email on 9/21/2020:

“Reverend Benson, we have received all of the messages and the photos. I have forwarded the messages to our District Executive, Ken McClain, who will be giving direction to address the situation on the property. I will also be getting back to you soon on the status of the work we are planning in the field adjacent to your home regarding the vibration monitoring.”

Your continued involvement and participation in the region's maintenance and developments is much appreciated.

Public comments on agenda and non-agenda items received at the DVRPC Board Meeting held on September 24, 2020

Rev. Glen Benson, Delaware County

Rev. Benson made public comments asking members of DVRPC's Board, and in particular, state officials to respond to emails he submitted prior to the Board meeting. Those emails, included above, detail maintenance issues on a lot next to his property, infringing on his ability to use his front and back yards. Rev. Benson noted that while DVRPC is not directly responsible for issues concerning his home, which is next to I-95, the Commission's board meetings are the only place he has a public opportunity to address such concerns to representatives from PennDOT.

Response -- Sent October 7, 2020:

Thank you for making public comments at DVRPC's September 24th Board meeting. DVRPC staff members have directly emailed with you or have been a part of email distribution lists between you and Charles Davies, Assistant District Executive at PennDOT District 6. We understand that you are presenting two issues.

The first is about structural damage to your house, located near or adjacent to I-95. Based on emails sent between September 21, 2020 and September 24, 2020, PennDOT District 6 is in contact with you to set up a vibration test. Additionally, the I-95 Noise Abatement project is advancing, which may result in noise barriers installed along I-95 in the vicinity of your house.

The second is to do with regular maintenance of a lot adjacent to your property and presumably a part of the highway facility. Similarly, Charles Davies is in contact with you as well as PennDOT's maintenance operations.

While DVRPC is not involved in maintenance/operations or implementation of transportation projects, we, as an MPO, are involved in seeking and collecting public input, and facilitating dialogue between different levels of government and the region's residents. In your earlier statements, submitted via email in advance of the September Board meeting, you claim that you are experiencing discrimination based on your race.

As a recipient of federal funds, PennDOT must comply with Title VI of the Civil Rights Act of 1964 and additional nondiscrimination requirements when it carries out its

activities. Please see PennDOT's Bureau of Equality Opportunity and its Title VI Discrimination Complaint Process, available here: <https://www.penndot.gov/about-us/EqualEmployment/Pages/TitleVI.aspx>. You can also contact them by phone at 717-787-5891 or 800-468-4201.

A summary of your public comment as well as this response will be published to DVRPC's website as part of the record for the 9/24 Board meeting.

Sue Herman, Bucks County

Ms. Herman made a public comment in regards to DVRPC's Regional Airport System Plan and its inclusion of the Trenton-Mercer Airport, known by its aviation acronym TTN, as an airport that should expand its commercial passenger service. Ms. Herman sent her comments as well as supporting documents to the DVRPC Board shortly after the September Board meeting. Those materials are included at the end of this PDF document. [[Google folder for now](#)]

DVRPC also received an email and supporting documents on 10/5/2020. Those materials are also included in this document. [[Google folder for now](#)].

Response -- Sent on October 7, 2020

Thank you for making public comments at DVRPC's Board meeting on 9/24 as well as sending materials via email to DVRPC's Board members on 9/24 and 10/5.

DVRPC recognizes the concerns of the region's residents as it relates to the planned improvements at Trenton-Mercer Airport(TTN). As we emphasized in our November 4, 2019 correspondence to the FAA we strongly support the continued examination and consideration of the environmental and societal impacts created by any changes in facility operations on residents of both Mercer County, NJ and neighboring Bucks County, PA, in accordance with established guidelines.

DVRPC's aviation planning work and products do not dictate plans for individual airport expansions but instead serve to document individual facility plans and system needs in an effort to better inform other investments that benefit the regional aviation system, with a primary focus on general aviation activities. The Regional Aviation System Plan (RASP) is the documentation of these findings and in our most recent RASP published in July of 2014. In that document, DVRPC did not make a recommendation that TTN become a "booming airport". In addition, the RASP recognizes TTN by its Federal statutory classification as a Nonhub Commercial Service airport and has never recommended its consideration for planning purposes or otherwise as any other facility

classification.

The 2040 RASP documents only one recommendation directly related to the commercial service activity at TTN by stating “to increase the utilization of secondary commercial service airports, it is important to offer good ground transportation links to provide better access and reduce adjacent road congestion.” This recommendation was further expanded for TTN to include: “establish a direct bus link between the airport terminal and the Trenton Transit Center.”

DVRPC is scheduled to update the RASP this fiscal year with a planned update to be published in the Fall of 2022.

A summary of your public comment, the supporting materials you submitted, and this response will be published to DVRPC's website as part of the record for the 9/24 Board meeting.

Ammon Baker, Signal Control Products

Ammon Baker, who works at Signal Control Products, a company that provides traffic signal equipment for transportation projects, made a public comment asking if COVID19 and the resulting reduction in tax collection will affect transportation funding, and specifically projects that are in the most recent PA TIP. Mr. Baker recounted that he recently reviewed the draft FY2021 TIP Highlights document and saw that FY2021 funding was about the same amount of funding compared to the year before.

Response - Sent on October 7, 2020

Thank you for making public comments at DVRPC’s Board meeting on 9/24.

As you know the Covid-19 pandemic has taken a significant toll on the economic conditions of the region, Commonwealth, and entire nation. Financial Guidance is administered by PennDOT and requires buy-in and approval from the majority of planning partners around the state, as well as federal partners. Financial Guidance is guidance outlining what the region and the state can reasonably expect to receive during the years of an adopted state and regional TIP. The Guidance is a snapshot in time for a planning document and takes into account many different processes, including state sources of funding and federal funding, as enabled or created through federal transportation legislation.

There are declining revenues of the State Motor License Fund. The federal transportation bill, known as the FAST Act expired on September 30, 2020, but a

Continuing Resolution was signed into law and extended the FAST Act until September 30, 2021. The region, as well as the rest of the country, is still experiencing the impacts of the Covid-19 pandemic. DVRPC will continue to work with PennDOT to determine specific impacts on TIP projects as more is learned about revenue, whether funding changes will affect primarily capital, maintenance or discretionary projects, and whether there is any additional federal response, such as an infrastructure stimulus act. If these situations affect DVRPC's TIP, the changes will be available to the public, through DVRPC's monthly Board meetings and the resulting materials.



Alison Hastings <ahastings@dvrpc.org>

Trenton- Mercer Airport: RRTS Public Comment at 9/24/20 DVRPC Board Meeting

1 message

susan herman <rtrsbuckspa5@gmail.com>

Thu, Sep 24, 2020 at 11:12 AM

To: Andrew.Simpson@phila.gov, BQuinde@njtransit.com, Brian.Leckie@dot.nj.gov, Cheryl.Goldman@dot.nj.gov, Christopher.Puchalsky@phila.gov, CommHarvie@buckscounty.org, DEBrown@septa.org, Daniel <dan.kelly@nj.gov>, David.Caulfield@dep.nj.gov, Donna.Zucchetti@dot.nj.gov, Elizabeth.Semple@dep.nj.gov, Eugene.Porochniak@dot.gov, JHolton@septa.org, Jennifer.Crobak@dot.gov, John.Wolick@camdencounty.com, Kelley.Yemen@phila.gov, MZOCHOWSKI@mercercounty.org, MaddenK@co.delaware.pa.us, Mayor@ci.camden.nj.us, Melanie.Willoughby@sos.nj.gov, Mike.Russo@dot.state.nj.us, PA_Webmanager@hud.gov, Richard.brown@sos.nj.gov, Rudy.Rodas@nj.gov, Stephen.Fowler@dot.nj.gov, "Stone, Evan" <estone@buckscounty.org>, TSteinitz@septa.org, abobbitt@trentonnj.org, abockis@saul.com, ahartzell@pa.gov, akpayne@buckscounty.org, alicia.nolan@dot.gov, alifurman@pa.gov, andrew.levecchia@camdencounty.com, andrew.swords@dot.state.nj.us, anmiller@ci.camden.nj.us, anne.kelly@phila.gov, b_holcomb@drpa.org, barry.ableman@sos.state.nj.us, bdelisle@trentonnj.org, bdonovan@chesco.org, becoat.gregory@epa.gov, bheigel@paturnpike.com, bhughes@mercercounty.org, bmcfadden@septa.org, boleary@chesco.org, bproska@trafficpd.com, brandon.r.porinchak@hud.gov, brian.goodson@dot.gov, brownc@co.delaware.pa.us, bstyche@chesco.org, cgreenwood@ceocouncilforgrowth.com, ckastrenakes@gmtma.org, commissioner@dep.nj.gov, cpregosch@buckscounty.org, crobinson@trentonnj.org, cstuart@montcopa.org, cthomas@co.burlington.nj.us, daniel.kelly@nj.gov, darin.gatti@phila.gov, david.kanthor@phila.gov, diane.scaccetti@dot.nj.gov, donna.rendeiro@sos.nj.gov, dspence@co.gloucester.nj.us, easmith@septa.org, edwillia@ci.camden.nj.us, eleanor.sharpe@phila.gov, equinn@chesco.org, eric.powers@dot.nj.gov, eroe@chesco.org, evizza@ceocouncilforgrowth.com, fharwell13@gmail.com, fmw@mwfo.com, gburritt@admarble.com, gfallat@mercercounty.org, hastingstm@co.delaware.pa.us, hilll@co.delaware.pa.us, hsimmons@co.gloucester.nj.us, jacqueline.o.davis@phila.gov, james.vari@dot.state.nj.us, jbarr@septa.org, jdavis@paturnpike.com, jdrink@drpa.org, jeannette.brugger@phila.gov, jhuston@co.gloucester.nj.us, jim.lewis@dot.state.nj.us, jkeller@pottstown.org, jkorus@pa.gov, jmosca@pa.gov, jneal@chestercity.com, john.haak@phila.gov, jromano@larsondesigngroup.com, jthanson@drpa.org, jumorton@ci.camden.nj.us, jwilkerson@trentonnj.org, kamcfarlane@drpa.org, kbecica@camdencounty.com, kcastagnola@southjerseyport.com, keith.lynch@dot.gov, keith.skilton@dot.gov, kelmack@verizon.net, kskeels@drjtbc.org, lashifflet@state.pa.us, lbelmonte@pa.gov, lfloyd@mercercounty.org, lguarini@pa.gov, liz.feinberg@verizon.net, lmillan@njtransit.com, louc@camdencounty.com, loutan.reema@epa.gov, lrichards@septa.org, lthompson@njtransit.com, lyoung@philaport.com, mark.squilla@phila.gov, martine.decamp@phila.gov, mcsafe27@yahoo.com, medmond@montcopa.org, michael.a.carroll@phila.gov, michelle.webb@phila.gov, mkichline@chesco.org, mkolber@trentonnj.org, mlawson@mercercounty.org, mmoskowitz@chesco.org, moltzen.michael@epa.gov, monica.etz@dot.state.nj.us, mpopek@montcopa.org, mremsa@bcbridges.org, mshorr@pa.gov, nathan.powers@phila.gov, nhaynes@philaport.com, nicholas.baker@phila.gov, nralston@pa.gov, patpatters@pa.gov, paul.j.lehmann@hud.gov, pheck@sjta.com, plspinelli@drpa.org, prykard@chestercity.com, pwillan@klehr.com, raygreen@pa.gov, raymond.tomczak@dot.gov, rgbrahler@buckscounty.org, richard.m.ott@hud.gov, rkhepkins@drpa.org, rlittle@drjtbc.org, robert.clark@dot.gov, rofogel@pa.gov, rsaintilien@trentonnj.org, rroberts@njtransit.com, ruth.foster@dep.nj.gov, r wonderling@greaterphilachamber.com, sakinah.hearn@phila.gov, sean.thompson@dca.state.nj.us, servidio.cosmo@epa.gov, sfrance@montcopa.org, shaffert@co.delaware.pa.us, sheppard.v.williams@hud.gov, sregister@trentonnj.org, sshulz@camdencounty.com, sshankar@pa.gov, stephenmazor@sjta.com, sutapa.bandyopadhyay@dot.gov, tbianco@co.gloucester.nj.us, terry.garcia@dot.gov, timothy.lidiak@dot.gov, tkcook-artist@drpa.org, tkirkland@chestercity.com, tomcolemant@rclawnj.com, tstanuikynas@bcbridges.org, tziegler@co.gloucester.nj.us, uzoma.anukwe@dot.gov, valeriya.remezova@dot.gov, varkoosh@montcopa.org, vbasara@ci.camden.nj.us, vvoltaggio@co.gloucester.nj.us, wcshanahan@drpa.org

Cc: Brram.org@gmail.com, CommDiGirolamo@buckscounty.org, CommEllisMarseglia@buckscounty.org, "Daniel R. Grenier" <dgrenier@lmt.org>, David Bria <dbria@yardleyboro.com>, "David J. Truelove" <dtruelove@hillwallack.com>, "Fagan, Dan" <dan.fagan@pasenate.com>, Fredric K Weiss <fweiss@lmt.org>, James McCartney <jmccartney@lmt.org>, John Lewis <jlewis@lmt.org>, "Kurt M. Ferguson" <kurtf@lmt.org>, "Rep. Perry Warren" <RepWarren@pahouse.net>, Rose Wuenschel <Rosemary.wuenschel@pasenate.com>, "Santarsiero, Senator Steve" <Steve.santarsiero@pasenate.com>, Shannon.Sticker@pasenate.com, Sue Simon <sue.simon@mail.house.gov>, Suzanne Blundi <sblundi@lmt.org>, Trenton Threatened Skies <trentonthreatenedskies@gmail.com>, bseymour@dvrpc.org, kyle melander <kyle.melander@mail.house.gov>, ryan bevitz <rbevitz@pahouse.net>, susan herman <rtrsbuckspa5@gmail.com>, Alison Hastings <ahastings@dvrpc.org>, renee.wise@dvrpc.org

Dear DVRPC Board Members,

We respectfully request that you acknowledge receipt of this email.

Attached please find Public Comment made by Residents for Regional Traffic Solutions, Inc. (RRTS) at this morning's 9/24/20 DVRPC Board Meeting.

We implore the DVRPC Board to vigorously and formally require the DVRPC to re-examine its plans to make TTN a "booming airport" and re-prioritize the importance of clean water to the region as one of the primary goals.

The first attachment below is RRTS's Public Comment made during the 9/24/20 meeting. The other attachments are referenced in our Public Comment.




Thank you for your attention to this serious public health issue.

Sincerely,

Susan Herman
President, RRTS

 [073020 NJ Clean Air Council Public Hearing Test...](#)

3 attachments

-  **092420 DVRPC Board mtng. Final RRTS Public Comment.pdf**
707K
-  **Phila. Inquirer 071320 PFAS testing planned for 2 counties.pdf**
1490K
-  **2020 PA DEP Water Quality Report Written Comments.pdf**
13391K

Public Comment made by Susan Herman, on behalf of Residents for Regional Traffic Solutions, Inc., at the September 24, 2020 Meeting of the DVRPC Board

Good morning. I am Susan Herman, President of Residents for Regional Traffic Solutions, Inc.* (a.k.a. RRTS; P.O. Box 285, Newtown, PA 18940)

Trenton-Mercer Airport (a.k.a. TTN) is continuing large-scale expansion under the radar - as it has gotten away with doing during the last 25 years - regardless of the grave environmental & fiscal costs to the residents, businesses & communities of Mercer County (NJ) & Bucks County (PA), and the millions of people who get their residential drinking water from the Delaware River. The vulnerable NJ communities of Ewing Township and the City of Trenton have been - and will continue to be – the hardest hit.

In PA Congressman Brian Fitzpatrick’s August 2020 Written Testimony submitted for the **7/30/20 New Jersey Clean Air Council Public Hearing RE: Past, Present, and Future: Air Quality Around Our Ports and Airports**, he states, “...TTN implemented a comprehensive Master Plan that calls for large-scale enhancements to the terminal, taxiway, and runway to increase passenger traffic at TTN. Unfortunately, TTN has chosen to segment these projects in an effort to reduce the level of NEPA analysis required from an Environmental Impact Statement (EIS) that would require a broader scale cumulative impact analysis that would take into consideration the impacts to my constituents in Pennsylvania. The planned airport expansion has the potential to negatively impact the residents, businesses, and community that comprise PA-01, as a flight path associated with the airport is directly above the district. Adding to the already poor air quality of the Philadelphia Metropolitan area, the first phase of the proposed plan will result in the clearing of 2.3 acres of trees within 100 feet of contaminated groundwater associated with the Naval Air Warfare Center (NAWC)...”

Residents in both Mercer County, NJ and Bucks County, PA share Congressman Fitzpatrick’s concerns. We are worried about the release of poisonous contaminants into surrounding tributaries and the Delaware River, including PFOS, VOC’s and mercury known to be present at the NAWC. As you know, the Delaware River is a primary source of residential drinking water for millions of people. We know from the recent July 2020 launch of the PA PFAS Multi-Site Study, a national study where the CDC has selected Pennsylvania & New Jersey among 7 states to participate (see attached 7/13/20 article titled PFAS testing planned for 2 counties), that PFAS contamination of drinking water is linked to harming children’s neurological development, kidney cancer and testicular cancer and studies suggest that exposure to high levels of PFAS can

**Residents for Regional Traffic Solutions, Inc. (RRTS) is a non-profit organization founded in August, 2001. Its purpose is to engage in public awareness as to traffic issues in the Central Bucks County area. RRTS focuses on issues related to transportation, infrastructure and the impact of transportation-related decisions on regional populations. In the case of Trenton-Mercer Airport, the impacted regional populations are in Mercer County, NJ & Bucks County, PA.*

have a detrimental effect on the body's immune system. In fact, U.S. Senators Bob Menendez (NJ) and Bob Casey (PA) are part of a group of nineteen (19) Senators inquiring about whether the potential connection between PFAS exposure and COVID-19 is being thoroughly examined by the U.S. Department of Health.

It is clear that TTN's end goal is to become the eastern HUB described in the Delaware Valley Regional Planning Commission's (DVRPC's) July 2014 publication titled 2040 Regional Airport System Plan (RASP), **a plan that calls for expanding the airport far beyond an appropriate-sized local airport**. Page 32 of the 2040 RASP it states, "The airport [TTN] is marketing itself as an alternative to PHL [Philadelphia International Airport] and EWR [Newark's Liberty International Airport], offering less hassle".

On DVRPC's website it states, "DVRPC's vision for the Greater Philadelphia Region is a prosperous, innovative, equitable, resilient, and sustainable region...that protects and preserves our natural resources while creating healthy communities..."

*The DVRPC has lost its way regarding its expansion plans for TTN. Current plans are resulting in the demise of: our natural resources, healthy communities, quality of life and home values. **Today, we implore the DVRPC Board to vigorously and formally require the DVRPC to re-examine its plans to make TTN a "booming airport"* and re-prioritize the importance of clean water to the region as one of the primary goals.***

We will now email the DVRPC Board this Public Comment. Please see the four (4) attachments, including a video titled Trenton Airport Expansion: Your Neighbors' Concerns. Click on youtube link <https://www.youtube.com/watch?v=ZHU7m1Rzvyw&feature=youtu.be>

Thank you.

**See page 43 of DVRPC's publication titled [resilience] 2014 WEEKLY PLANNER/ FY2013 ANNUAL REPORT*

ATTACHMENTS:

- 7/13/20 Philadelphia Inquirer article: PFAS testing planned for 2 counties
- Written Testimonies by politicians/citizens.**7/2020 NJ Clean Air Council Public Hearing**
- Written Comments by politicians/citizens.**PA DEP 2020 Water Quality Report**
- VIDEO** titled Trenton Airport Expansion: Your Neighbors' Concerns (click on youtube link below)
<https://www.youtube.com/watch?v=ZHU7m1Rzvyw&feature=youtu.be>



Township of Lower Makefield

BOARD OF SUPERVISORS
Fredric K Weiss, Chair
Daniel R. Grenier, Vice Chair
James McCartney, Secretary
Suzanne S. Blundi, Treasurer
John B. Lewis, Supervisor

August 10, 2020

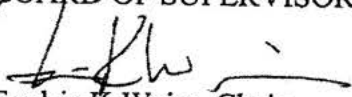
PA Department of Environmental Protection

RE: Public comment for the 2020 Pennsylvania Integrated Water Quality
Monitoring and Assessment Report

The Lower Makefield Township Board of Supervisors would like to bring to the attention of the PA DEP our community's water pollution concerns for the Delaware River regarding \$177M of planned development projects at the Trenton-Mercer Airport in New Jersey. The projects are aimed at significantly expanding air traffic capacity at the airport and they have not been given an adequate environmental review regarding ground water run-off, additional contaminants introduced through airport operations and air pollution, and the impact of construction projects on known locations of PFOS/PFOA contaminants. The details are presented in this letter dated November 12, 2019 from Congressman Brian Fitzpatrick to the Secretary of US Department of Transportation, Elaine L. Chao. One of the key problems is that the FAA and airport authorities assert that all of these projects are disconnected and they do not recognize the cumulative impact that these projects will have on the local community in terms of noise, quality of life and air and water pollution. We request that you ascertain what impact the TTN Airport Master plan projects will have on the safety and quality of drinking water for PA residents. We also ask that the PA DEP engage with the NJ DEP regarding their assessments and that you request NJ DEP prepare a full environmental impact statement for the collection of planned projects.

Very truly yours,

LOWER MAKEFIELD TOWNSHIP
BOARD OF SUPERVISORS


Fredric K. Weiss, Chair

1/3

BRIAN K. FITZPATRICK
1ST DISTRICT, PENNSYLVANIA

COMMITTEE ON FOREIGN AFFAIRS

COMMISSION ON SECURITY AND
COOPERATION IN EUROPE

COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE



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(202) 225-4276

1717 LANGHORNE-NEWTOWN RD.
SUITE 400
LANGHORNE, PA 19047
(215) 679-8102

Congress of the United States
House of Representatives
Washington, DC 20515

November 12, 2019

Elaine L. Chao
U.S. Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

Dear Secretary Chao,

I am writing today in response to the letter I received from the Federal Aviation Administration dated August 6, 2019 regarding Trenton-Mercer Airport (TTN). In the letter, Acting Administrator Daniel K. Elwell indicated that the FAA has reviewed the projects at TTN and believes that the airport has not engaged in segmentation and has properly evaluated cumulative impacts. As stated in my letter addressed to the U.S. Department of Transportation dated May 9, 2019, I continue to be concerned that TTN has chosen to segment these projects to reduce the level of environmental study required. Additionally, I am greatly concerned that the TTN has overlooked potential existing ground water contamination while conducting their Environmental Assessment (EA). Therefore, I am requesting that the FAA review the mechanisms used by TTN to complete their Environmental Assessment to ensure that all environmental impacts, including threats to the safety of ground and drinking water, be evaluated.

The FAA, following the NEPA process, issued a FONSI/ROD for the TTN Runway Protection Zone and Obstruction Mitigation project after evaluating the Environmental Assessment. The TTN EA indicates that the proposed project will result in the clearing of 2.3 acres of trees within 100 feet of contaminated groundwater associated with the Naval Air Warfare Center (C&S Companies Environmental Assessment for Runway Protection Zones and Obstruction Mitigation page 3-24, July 2019). Although several contaminants are listed in the EA, there is no mention of the presence of PFOS/PFOA. However, according to a 2018 Congressional Brief by Maureen Sullivan, Deputy Assistant Secretary of Defense, the DoD monitored groundwater wells around the Naval Air Warfare Center Trenton and found that the majority tested near above the EPA LHA for PFOS/PFOA. Of the 38 wells tested, 23 tested above the EPA LHA with readings in the range of 178 – 27,800 PPT. (FY18 HASC on PFOS-PFOA, page 36) Considering the proximity of the wells to TTN, and how quickly PFOS/PFOA contaminations bioaccumulate, it is likely that the contaminants have spread to neighboring wells and ground water. Given the health risks associated with PFOS/PFOA exposure, it is critical that the environmental assessment for any project at TTN take these risks into account.

2/3

It is my understanding that the spirit of the NEPA process is to ensure that project impacts are reviewed in their totality to ensure that proper environmental protections are maintained. I share the concern of my constituents that the TTN master plan and RPZ project impact studies are not in keeping with the spirit of NEPA. I urge the TTN management, their consultants and the FAA to consider cumulative impacts of not only connected actions at the airport property, but also those off-airport factors that may impact the surrounding communities.

I appreciate your attention to this matter and look forward to hearing from you.

Sincerely,



Brian Fitzpatrick
Member of Congress

BRRAM

25 S. Main St # 208

Yardley, PA 19067

bucks residents for responsible airport management

11 August 2020

TO: Pennsylvania Department of Environmental Protection (PA DEP)

RE: 2020 Water Quality Monitoring and Assessment Report-PUBLIC COMMENT

In response to the Water Quality Monitoring and Assessment Report, the Bucks Residents for Responsible Airport Management (BRRAM)** would like to comment on this assessment.

The public has been made aware of dangerous chemicals contaminating the water supply around the Willow Grove Naval Air base. PFAS, are now making headlines in Bucks as studies are being done to determine the impact on our health. PFAS in your blood stays forever and even minute amounts impact health, including increased cancer risk, infertility, and issues surrounding growth and learning in children. In a recent Philadelphia Inquirer article ([click here](#)), this issue is explained.

The PA DEP should be aware that PFAS has been found in the soil at Trenton Mercer Airport (TTN) in Ewing, New Jersey—*less than 4 miles* from the Delaware River. This Airport is adjacent to surrounding wetlands and then the Delaware River – a major water supply intake.

BRRAM has begun circulating a petition. Within the 7 days, we've received over 250 signatures expressing concern about the impact TTN will have on our water quality. The signatures accumulate daily:

Whereas,

the Pennsylvania Department of Environmental Protection 2020 Water Quality Monitoring and Assessment Report highlights the importance of clean water to Pennsylvania citizens along with its extensive restoration efforts and seeks public comment by Aug 11, 2020,

the former Naval Air Warfare Center site in West Trenton, NJ is known to have groundwater polluted with PFAS (poly and perfluoroalkyl substances) and other toxic chemicals,

the expansion plans of the Trenton Mercer airport (TTN) will increase the water runoff through the former Naval Air Warfare Center site and into the Delaware River, which is the drinking water supply for thousands of Bucks County (PA) and Mercer County (NJ) residents,

proactively avoiding dangerous water pollution is in the best interests of the health, environment and community of Bucks County (PA) and Mercer County (NJ) citizens;

And Whereas,

1/2

The Trenton Mercer Airport continues to move forward with plans to expand the airport substantially with no regard for the water, air, wildlife, other environment impacts or its citizens in the surrounding region;

the undersigned concerned citizens hereby request and petition that

the Pennsylvania Department of Environmental Protection should vigorously oppose the expansion plans of the Trenton Mercer Airport (TTN) that will potentially increase water pollution in the state

the Delaware Valley Regional Planning Commission (DVRPC) should re-examine its plans and re-prioritize the importance of clean water to the region as a one of the primary goals

the Trenton Mercer Airport should conduct a full and comprehensive Environmental Impact Statement (EIS) to assess the cumulative effect of its expansion over the last twenty years and its future expansion plans, particularly considering the impact of PFAS pollutants on the Delaware River drinking water supply

the Mercer County (NJ) Board of Freeholders should immediately halt ALL expansion plans for the Trenton-Mercer Airport until a cumulative Environmental Impact Statement is completed that truly measures the negative impacts to all affected Pennsylvania and New Jersey municipalities, with a full public review

elected officials at every level of local and state government in Pennsylvania should vigorously use all means at their disposal demand that Mercer County (NJ) officials halt the airport expansion.

We urge the PA DEP to oppose the current proposed unchecked expansion plans of the Trenton Mercer Airport (TTN), outlined in the Master Plan 2018 without proper studies.(EIS)

These expansion plans will result in toxic air & water pollution that will cause irreparable harm to affected residents Bucks County, PA.

Thank you for your kind attention.

Sincerely,



Holly J Bussey, President

*****Bucks Residents for Responsible Airport Management (BRRAM) is a non-profit volunteer organization comprised of over 1,000 concerned citizens. BRRAM works with other organizations in both Pennsylvania and New Jersey, as an advocate for our residents, to help demand accountability from TTN and that TTN be a "good neighbor" respecting the environmental health, safety and well-being of all its neighbors.***

R.R.T.S.
Residents for Regional Traffic Solutions, Inc.
PO Box 285
Newtown, PA 18940
rrtsbucks5@gmail.com

**Pennsylvania Department of Environmental Protection (PA DEP):
2020 Water Quality Monitoring and Assessment Report**

WRITTEN COMMENT SUBMISSION (via email)

Aug. 10, 2020 # Pages: 11-page cover letter

Attachments: 6

BEFORE IT IS TOO LATE: OUR "ASKS" OF THE PA DEP

1.) We implore the PA DEP to vigorously & formally oppose all current and proposed expansion plans of Trenton-Mercer Airport (TTN), including the **Master Plan of 2018** that calls for:

- ...building a Passenger Terminal that is five (5) times the size of the current terminal
- ...the **Runway Protection Zone & Obstruction Mitigation Project**
- twenty-five (25) individually-considered, segmented-out projects

These expansion plans will result in toxic air & water pollution that will cause irreparable harm to affected residents in Mercer County, NJ and Bucks County, PA.

TTN continues to recklessly move forward with plans to expand the airport substantially, with no regard for the water, air, wildlife, other environment impacts on its citizens in the surrounding region. The former Naval Air Warfare Center in West Trenton, NJ (NAWC) is known to have groundwater polluted with PFAS* and other toxic chemicals. TTN's expansion plans will increase the water run-off through the former NAWC site and into the Delaware River, which is the drinking water supply for thousands of Mercer Co. (NJ) and Bucks County (PA) citizens. **PFAS contamination of drinking water is linked to harming children's neurological development, kidney cancer and testicular cancer.**

** PFAS- per-and polyfluoroalkyl substances – are a class of man-made chemical compounds used in producing products such as non-stick cookware coatings, fire retardant furniture, and foam used in firefighting. PFOA, once used to make Teflon, and PFOS, once used in Scotchgard, are among the most widely known, yet there are hundreds more still being used in manufacturing.*

2.) We also implore the PA DEP to develop an actionable response to meaningfully address the toxic air & water pollution that *ALREADY EXISTS TODAY*. TTN has *already* experienced large-scale expansion over the past 20 years, while skirting around having to do a Cumulative & Expansive Environmental Impact Statement (EIS) to measure the **cumulative impacts** on affected Mercer and Bucks County municipalities. The airport avoided having to do the EIS by breaking expansion into smaller projects, so that they were only subjected to narrow, isolated Environmental Assessments (EAs). This is segmentation, this is disingenuous, and this *already* threatens the health, safety & welfare of affected NJ and PA citizens.

SUMMARY

Residents in Mercer County (NJ) & Bucks County (PA) ask you to vigorously & formally oppose TTN's current & proposed expansion plans because...

1.) ...the airport's continued reckless, unchecked expansion will harm them & their families, as explained in the VIDEO at below link:

<https://www.youtube.com/watch?v=ZHU7m1Rzvyw&feature=youtu.be>

2.)...Health

- Airport plans will change storm drainage; there is known PFAS & other toxic chemical contamination of groundwater on airport property & the NAWC site, which could make TTN the next Flint, Michigan. PFAS contamination of drinking water is linked with harming children's neurological development, kidney cancer and testicular cancer. (See attached Philadelphia Inquirer article titled *PFAS testing planned for 2 counties: Adults and children from Bucks and Montco are being sought for a national study on the chemicals.*)
- U.S. Senators Bob Menendez (NJ) & Bob Casey (PA) are amongst 19 senators who want the U.S. government to find out if exposure to PFAS chemicals can make people more vulnerable to coronavirus.
- The particles in airplane exhaust are directly tied to heart disease and asthma. The dangerous, invisible, microscopic exhaust particles travel up to ten (10) miles outside the flight path. Even if residents cannot see the planes, they are at risk.
- Eat Locally? Thousands of residents depend on fresh fruits, vegetables & meats grown in Lawrence & Hopewell Townships. Heavy metals & organic compounds in airplane exhaust put our food at risk of contamination.
- There is a wealth of data about the negative impact of noise on learning, which is compounded by both vibration and by exhaust, as well as noise on hearing loss, particularly in children.

Environment

- Researchers are equating unregulated airplane exhaust to an urban freeway network & are warning that the air quality impacts have been seriously underestimated.
- Toxic emissions from planes flying below 900 feet endanger joggers, cyclists, and wildlife at Mercer Meadows Park & the Pole Farm Bird Sanctuary.
- Mercer & Bucks County residents are already subject to a record number of overflights & vehicular through-traffic; local airport expansion will further degrade our poor air quality. [Mercer County (NJ) is rated "F" in Air Quality by the American Lung Association.]
- The long term effects of ongoing, increased emissions in close proximity to residential areas and watershed tributaries cannot be ignored.

Financial

- Home values are estimated to decrease up to 30% near an airport.
- Mercer County has invested ?\$\$\$ in the airport over the last 20 years. What financial benefit has accrued and/or is flowing to the county and its citizens?

Irresponsible Government

- Past & current expansion has been divided into smaller projects to avoid doing a Comprehensive & Expansive Environmental Impact Statement (EIS) that measures the **cumulative impacts** on **ALL** affected NJ and PA municipalities.
- The residents who have been, and will continue to be, hardest hit by the airport's success in skirting around doing the EIS, are those residing in Ewing Township (NJ) and the City of Trenton (NJ). Environmental Justice & Social Justice are not being practiced.
- There has been (a) a history of blatant disregard for authentically including the public in the decision-making process for airport projects, (b) an unconscionable lack of transparency and (c) an **intentional neglect** on the part of New Jersey politicians & the airport to do whatever it takes to protect the health, safety & welfare of affected NJ and PA citizens.
- Annual flight volume through early 2019 has already exceeded the 2035 flight estimates presented to the community by 17,238 take-off/landings, 16 YEARS EARLY & PRIOR TO TERMINAL EXPANSION
- Mercer County Freeholders just authorized a \$54,000 contract to market the airport in the middle of a pandemic, when the future demand for air travel is completely uncertain and many airlines may go out of business
- During the unprecedented pandemic with unemployment and decreased tax revenues, why are much-needed county \$ being spent on the airport?

BACKGROUND

1.) RRTS, along with BRRAM (Bucks Residents for Responsible Airport Management) and Mercer County - based grassroots groups, has been concerned with the expansion of TTN for over 20 years. TTN expanded “under the radar” throughout the past 20 years, by approving and implementing numerous individual projects, whose whole equaled large-scale expansion. By dividing the expansion into segments, TTN has avoided having to do the Cumulative & Expansive Environmental Impact Statement (EIS) that would measure its **cumulative impacts** on ALL affected Mercer County, NJ & Bucks County, PA municipalities.

2.) Recently, residents are alarmed by the large number of projects that TTN has sought approvals for, without regard to **cumulative impact** on the environment, surrounding NJ & PA communities, and public health. There are at least twenty-five (25) in-process individual projects that we can list that have either been approved, are in the process of seeking approval, or are planned in the near future as “unrelated” or “independent” improvements.

All of these segmented, individually- considered projects are *outlined and proven to be related & interdependent in the Master Plan of 2018*. The Mercer County Website describes the Master Plan as such: *“the Airport Master Plan is essentially a facility planning study that sets forth a conceptual framework for possible future airport development”*. The **Airport Layout Plan (ALP)**, part of the Master Plan, clearly identifies a proposed terminal expansion, the **Runway Protection Zone & Obstruction Mitigation Project (RPZ Project)**, and development of Parcel A of the Naval Air Warfare Center (NAWC) where there are known PFOS, VOCs, mercury and other contaminants.

The danger of considering these projects separately was demonstrated at the Mercer County Freeholder Board Webex meeting on 4/23/20 when the development of Parcel A of the NAWC was discussed. Airport attorney, Mr. Markind, referred to the remediation barrier on Parcel A as being “in total disrepair” several times. There are known PFOS, VOCs, mercury and other contaminants on Parcel A and the adjacent Parcel B. Both groundwater and surface water contamination have been reported. While Parcel B continues to be managed by the Navy, it appears that Parcel A is going to be cleaned up privately as part of the Flightserv lease agreement. It was not clear, and the Freeholders did not seem to know, who was overseeing & responsible for the project.

Residents are concerned that the **Parcel A FONSI** indicates that there is “no impact, due to no changes in storm water run-off”, ignoring the fact that the adjacent, massive **RPZ Project** changes are anticipated to affect storm run off by nearly 1.5 million (1, 500,000) gallons/year, as estimated by the Watershed Institute during the public comments portion of the **Environmental Assessment for the RPZ Project** (pg. P-200-202). This estimate relates only to **RPZ Project –associated** changes to landscape, and did not account for climate-change related increases in precipitation or the additional massive airport build-out, as described above.

It makes sense that the Parcel A remediation barrier should be repaired. It also makes sense that its ability to withstand both **RPZ Project – caused** and climate-related increases in storm drainage, be addressed well in advance of any **RPZ Project** structure removal. This is but one example of why these projects **MUST** be considered together.

3.) The attached 11/12/19 letter from PA Congressman Brian Fitzpatrick to the U.S. Department of Transportation **RE: the RPZ Project** states,

“...I continue to be concerned that TTN has chosen to segment these projects to reduce the level of environmental study required. Additionally, I am greatly concerned that TTN has overlooked potential existing groundwater contamination while conducting their Environmental Assessment (EA). Therefore, I am requesting that the FAA review the mechanisms used by TTN to complete their Environmental Assessment to ensure that all environmental impacts, including threats to the safety of ground and drinking water be evaluated.....Although several contaminants are listed in the EA, there is no mention of the presence of PFOS/PFOA. However, according to a 2018 Congressional Brief by Maureen Sullivan, Deputy Assistant Secretary of Defense, the DoD monitored groundwater wells around the Naval Air Warfare Center Trenton and found that the majority tested near above the EPA LHA for PFOS/ PFOA...Given the health risks associated with PFOS/PFOA exposure, it is critical that the environmental assessment for any project at TTN take these risks into account...”

RRTS has provided the Mercer County Freeholders with this letter several times during Public Comment at their meetings. Despite Congressman Fitzpatrick’s repeated communications regarding his concern that segmentation has occurred (and that there has not been appropriate environmental scrutiny of TTN’s cumulative impacts), it is the Federal Aviation Administration (FAA) who **routinely** responds that segmentation has not occurred. The problem is that the FAA is like the fox guarding the hen house. The agency has demonstrated that it is driven by a self-interested agenda that DOES NOT include protecting the safety & welfare of citizens. (See attached 2/21/20 Buchalter article titled *Quiet Skies Congressional Caucus Gets Brush Off from FAA.*)

4.) The Mercer County Freeholders maintain that the **RPZ Project** is motivated purely by safety concerns and will not change airport operations. *This is boqus and disingenuous.* Aviation Professionals have advised that IT DOES NOTHING to change the safety margin. WHAT IT DOES is enable more operations and better fleet mixes.

In Mercer County's own EA, in Chapter 4, it states,

"The existing runway length needs to be maintained or it will result in a loss of operations and/or operational restrictions for the Airbus 320/320neo and the Gulf stream IV/V during wet and slippery runway conditions."

We experience wet and slippery conditions right now – should those planes be operating from this airport now? If the Mercer Co. Freeholders truly thought that this project was purely for safety concerns (which they learned about in March 2015), they would be curtailing those operations right now. It is blatantly obvious that a key purpose for this project is to effectively lengthen the runway so that TTN can have the big jets safely fly in all conditions, move lower flying & heavily laden planes, and significantly increase airport operations.

5.) More than eighteen (18) months ago, TTN promised that there would be a Public Meeting held in Bucks County, PA for New Jersey & Pennsylvania residents to review the EA and the status of the multiple current & planned projects associated with the **Master Plan of 2018**. Recently, BRRAM formally gave public comment at a Mercer County Freeholder meeting to request that the meeting be held. BRRAM also sent a formal letter to Freeholder Chairman, Andrew Koontz, requesting same. Below is the 8/3/20 email response that BRRAM received from Chairman Koontz & Mercer Co. Administrator Lillian Nazzaro:

"We forwarded your communication to the County Administrator. Please see their response below.

LAURENTI, Mario

Confidential Aide to Freeholder Andrew Koontz

From: Nazzaro L. Lillian, Esq. <lnazzaro@mercercounty.org>

Sent: Monday, August 3, 2020 9:28 AM

To: Koontz, Andrew <akoontz@mercercounty.org>

Subject: RE: Mercer Freeholders Public Comment July 16 follow up - Request for Virtual Meeting on Trenton Mercer Airport

Chairman,

As previously discussed in Freeholder meetings, a public meeting will take place in Pennsylvania as soon as the EA is approved by the FAA. The County has every intention of going forward with the public meeting and residents of Pennsylvania will be advised accordingly. Finally, the meeting will most likely be a Tele Town hall meeting.

Thank you,

Lillian L. Nazzaro, Esq.
Mercer County Administrator"

This is unacceptable. It ignores the concerns of PA citizens and is not acting in good faith.

6.)At the 10/24/19 meeting of the Delaware Valley Regional Planning Commission (DVRPC) Board, RRTS gave public comment expressing the serious concerns that affected New Jersey & Pennsylvania residents have with the continued, unchecked expansion of TTN. The 11/17/19 GUEST OPINION that appeared in the local paper, THE ADVANCE OF BUCKS COUNTY, summarized our public comment. (See Guest Opinion titled *An open letter to the DVRPC on Trenton-Mercer Airport* in the attachment labeled **DVRPC-related communications**.)

In the 11/4/19 letter from Barry Seymour, DVRPC Executive Director, to Jennifer Solomon of the FAA (See 11/4/19 letter in attachment labeled **DVRPC-related communications**), it states,

"...As TTN continues to advance their improvement plans for the facility, residents of both Mercer County, NJ and neighboring Bucks County, PA have expressed concerns about potential environmental and social impacts created by any changes in facility operations. We strongly support the continued examination and consideration of these impacts and potential mitigation strategies, in accordance with the FAA guidelines..."

The DVRPC is disingenuous in its expression of concern for the health, safety & welfare of NJ and PA residents. **The following disturbing quotes are from the DVRPC's July 2014 publication titled 2040 Regional Airport System Plan (RASP), that calls for expanding TTN far beyond an appropriate-sized local airport:**

On page 32, there's a section titled "Trenton-Mercer (TTN), New Jersey" and the first sentence of the second paragraph states, *"The airport is marketing itself as an alternative to PHL [Philadelphia International Airport] and EWR [Newark's Liberty International Airport], offering less hassle".*

Page 1 is the "Executive Summary" which states this half way down the page, *"Therefore, the objectives for the 2040 RASP took these factors into account, and the following priorities were agreed upon by the RASP subcommittee: 1. Expand commercial air service capacity within the region...3. Sustain and improve infrastructure to attract more users...This report is being prepared with the support of the Federal Aviation Administration (FAA) ..."*

Page 3 states this in the first paragraph, *" 'Aviation' to most people in the region will likely be associated with Philadelphia International Airport (PHL), the 11th busiest airport in the world (in terms of aircraft operations), but the Delaware Valley is also served by two other commercial service airports, Trenton-Mercer (TTN) and Wilmington (ILG)..."*

Page 4 is “Figure 1: Regional Airport System Map”. TTN has the same icon as Philadelphia International Airport (PHL) and Wilmington (ILG).

Halfway down page 5 it states, “*One specific economic aid for the region comes with the availability of U.S. Customs and Border Protection facilities at the region’s airports. All three commercial service airports – PHL, TTN, and ILG- have these facilities.*”

On page 7, it states this in the third paragraph, “*Commercial service airports serve scheduled service airlines, corporate aviation, and in the case of ILG and TTN, some military operations.*”

The DVRPC’s plan to expand TTN into a “booming airport” (as referenced on page 43 of DVRPC’s 2014 publication titled [resilience]), is inconsistent with its stated vision on its website Home Page on 2/19/20 which stated,

“The Delaware Valley Regional Planning Commission is the federally designated Metropolitan Planning Organization for a diverse nine-county region in two states: Bucks, Chester, Delaware, Montgomery, and Philadelphia in Pennsylvania; and Burlington, Camden, Gloucester, and Mercer in New Jersey.

DVRPC’s vision for the Greater Philadelphia Region is a prosperous, innovative, equitable, resilient, and sustainable region that increases mobility choices by investing in a safe and modern transportation system; that protects and preserves our natural resources while creating healthy communities; and that fosters greater opportunities for all.”

(See attachment labeled **DVRPC-related communications**: DVRPC’s Vision on 2/19/20 website Home Page)

The DVRPC should re-examine its plans to make TTN a “booming airport” and re-prioritize the importance of clean water to the region as one of the primary goals.

7.)It is unconscionable that New Jersey politicians, from the local level up through the Federal level, ignored the attached 9/30/19 letter from RRTS titled:

RE: IMMINENT PROPOSED EXPANSION OF TRENTON-MERCER AIRPORT (TTN): New Jersey & Pennsylvania residents living in municipalities surrounding TTN, worry that it will cause irreparable harm to their health, safety & welfare. The harm is likely to include, but not be limited to, irreparable damage to the water supply.

Our 9/30/19 letter is a formal, integral part of this written comment that we are submitting. We respectfully request that Secretary McDonnell read it in its entirety. If it is a problem that it is in pdf format, note that Secretary McDonnell received a hard copy of it via FedEx (signature required).

Thank you for the opportunity to comment.

Very truly yours,



Susan Herman, President
Residents for Regional Traffic Solutions, Inc.*

**Residents for Regional Traffic Solutions, Inc. (RRTS) is a non-profit organization founded in August, 2001. Its purpose is to engage in public awareness as to traffic issues in the Central Bucks County area. RRTS focuses on issues related to transportation, infrastructure and the impact of transportation-related decisions on regional populations. In the case of Trenton-Mercer Airport, the impacted regional populations are in Mercer County, NJ & Bucks County, PA.*

Attachments:

- RRTS Written Comment letter: PA DEP 2020 Water Quality Report
- 7/13/20 Philadelphia Inquirer article: *PFAS testing planned for 2 counties*
- 11/12/19 letter from PA Congressman Fitzpatrick to U.S. DOT
- 2/21/20 Buchalter article: *Quiet Skies Congressional Caucus Gets Brush Off from FAA*
- DVRPC-related communications: 11/17/19 Guest Opinion in THE ADVANCE, 11/4/19 letter from DVRPC to FAA, DVRPC's Vision on 2/19/20 website Home Page
- 9/30/19 letter from Residents for Regional Traffic Solutions, Inc. (RRTS)
RE: IMMINENT PROPOSED EXPANSION OF TRENTON-MERCER AIRPORT (TTN):
New Jersey & Pennsylvania residents living in municipalities surrounding TTN, worry that it will cause irreparable harm to their health, safety & welfare. The harm is likely to include, but not be limited to, irreparable damage to the water supply.
- VIDEO titled *Trenton Airport Expansion: Your Neighbors' Concerns* (youtube link provided)

CC:*All individuals/groups will receive this via email. Those asterisked will also receive it via Certified Mail, Return Receipt.*

FEDERAL LEVEL:

- U.S. Senator Bob Casey (PA)*
- U.S. Senator Pat Toomey (PA)*
- Congressman Brian Fitzpatrick (PA)*
- U.S. Senator Bob Menendez (NJ)*
- U.S. Senator Cory Booker (NJ)*
- Congresswoman Bonnie Watson-Coleman (12th Cong. District-NJ)*
- Congressman Tom Malinowski (7th Cong. District-NJ)*
- Congressman Chris Smith (4th Cong. District-NJ)*

Congressional Quiet Skies Caucus

STATE LEVEL:

Governor Tom Wolf (PA)*
Secretary Patrick McDonnell, PA DEP*
Secretary Leslie Richards, PA DOT*
PA Attorney General Josh Shapiro*
Senator Steve Santarsiero (PA)*
State Representative Perry Warren (PA)*
Governor Phil Murphy (NJ)*
Commissioner Catherine McCabe, NJ DEP*
Commissioner Diane Gutierrez-Scaccetti, NJ DOT*
Senator Shirley Turner (D15-NJ)*
Senator Linda Greenstein (D14-NJ)*
Senator Christopher Batemen (D16-NJ)*

COUNTY LEVEL:

Mercer County Executive Brian Hughes*
Mercer Co. Freeholders (NJ): Cimino*, Koontz (chair)*, Cannon*, Walter*, Frisby*, Colavita*, Melker*
Bucks County Commissioners (PA): Ellis-Marseglia (chair)*, Harvie* DiGirolamo*

MUNICIPAL LEVEL:

Members of Councils/ Committees in Mercer County (NJ):

East Windsor Twp.: c/o president (pres.)*
Ewing Twp.: c/o president*
Hamilton Twp.: c/o pres.*
Borough of Hightstown: c/o pres.*
Hopewell Borough: c/o pres.*
Hopewell Twp.: c/o pres.*
Lawrence Twp.: c/o pres.*
Borough of Pennington: c/o pres.*
Princeton: c/o pres.*
Robbinsville Twp.: c/o pres.*
City of Trenton: c/o pres.*
West Windsor Twp.: c/o pres.*

Members of Councils/ Boards of Supervisors (PA):

Langhorne Borough Council: c/o pres.*
Lower Makefield Twp. Board of Supervisors (BOS): Grenier*, Weiss (chair)*, Lewis*, Blundi*, McCartney*
Middletown Twp. BOS: c/o chair*
Morrisville Borough Council: c/o pres.*
Newtown Borough Council: c/o pres.*
Newtown Twp. BOS: Calabro (chair)*, Oxley, Mack, Davis, Fisher
Upper Makefield Twp. BOS: c/o chair*
Yardley Borough Council: c/o Bria (pres.)*
Falls Twp. BOS: c/o chair*

Barry Seymour; Executive Director, DVRPC*
DVRPC Board members
Evan Stone; Executive Director, Bucks County Planning Commission*
Lower Makefield Township (LMT) Manager, Kurt Ferguson*
LMT Solicitor, David Truelove*
LMT Trenton-Mercer Airport Review Panel

Bucks Residents for Responsible Airport Management (c/o President, Holly Bussey)
Trenton Threatened Skies
Mercer Quiet Skies
Residents for Regional Traffic Solutions, Inc.
Delaware River Keepers
Delaware/Raritan Canal Commission
Pennsylvania Canal Society
Canal Society of New Jersey
NJ Sierra Club
PA Sierra Club
NJ Clean Air Council
Clean Air Council (Philadelphia, PA)
NJ Audubon Society
Bucks County Audubon Society

Sue Simon

Kyle Melander

Rose Wuenschel

Shannon Sticker

Dan Fagan

Ryan Bevitz

*Ruth Foster** (Dir, NJ DEP Office of Permit Coordination / Environmental Review)

*John Ward**

*Patti Elkins**

*William Penn Foundation**

*Water Resources Assoc. of the Delaware River Basin**

*Partnership for the Delaware Estuary**

*Buxmont Coalition for Safer Water**

*Watershed Institute**

BRIAN K. FITZPATRICK
1ST DISTRICT, PENNSYLVANIA

COMMITTEE ON FOREIGN AFFAIRS

COMMISSION ON SECURITY AND
COOPERATION IN EUROPE

COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE



Congress of the United States

House of Representatives

Washington, DC 20515

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(215) 579-8102

August 13, 2020

Chairman John Valeri, Jr., Esq.
New Jersey Clean Air Council
401 E State Street
Trenton, NJ 08608

RE: Public Comment Regarding Air Quality Around Our Ports and Airports

Dear Chairman Valeri,

I am writing today to add to the public comments for the New Jersey Clean Air Council public hearing regarding air quality around our ports and airports. As a member of the Aviation Subcommittee of the Transportation & Infrastructure Committee and the Quiet Skies Caucus in Congress, I understand the impacts airports have on a neighboring community. I have been heavily involved in the proposed plan to modify the existing Trenton-Mercer Airport (TTN) and continue to be concerned with many of the environmental assessments that have gone into the proposed plan. I am requesting that the New Jersey Clean Air Council review their assessments on environmental impacts on all past, present and future airport plans and ensure that these evaluations receive the highest standard of review.

As you are aware, TTN has proposed and implemented several projects over the past 25 years with little input from the surrounding community as required by the National Environmental Policy Act of 1969 (NEPA) and the Federal Aviation Administration (FAA) Order 1050.1F - Environmental Impacts: Policies and Procedures. TTN implemented a comprehensive Master Plan that calls for large-scale enhancements to the terminal, taxiway, and runway to increase passenger traffic at TTN. Unfortunately, TTN has chosen to segment these projects in an effort to reduce the level of NEPA analysis required from an Environmental Impact Statement (EIS) that would require a broader scale cumulative impact analysis that would take into consideration the impacts to my constituents in Pennsylvania.

The planned airport expansion has the potential to negatively impact the residents, businesses, and community that comprise PA-01 as a flight path associated with the airport is directly above the district. Adding to the already poor air quality of the Philadelphia Metropolitan area, the first phase of the proposed plan will result in the clearing of 2.3 acres of trees within 100 feet of contaminated groundwater associated with the Naval Air Warfare Center (NAWC). In a response letter I received on May 11, 2020, the Federal Aviation Administration (FAA) acknowledged the NJDEP is actively working to remediate NAWC while stating the removal of trees will not significantly impact the groundwater quality in that impacted area.

1/2

Additionally, the standard of studying noise pollution is not consistent amongst airports. The amount of noise studies and impacts of noise pollution of airports are very different when comparing Newark Liberty International and the TTN. Larger airports are constantly testing noise impacts whereas smaller scale airports conduct sparse noise studies.

Going forward, I request New Jersey Clean Air Council review their assessments on environmental impacts and consider expanding its testing protocol on all existing and future evaluations.

If my office can be of any further assistance, please contact me at 215-514-0579.

Thank you,

A handwritten signature in black ink that reads "Brian Fitzpatrick". The signature is written in a cursive, slightly slanted style.

Brian Fitzpatrick
Member of Congress (PA-01)

STATE SENATOR
STEVE SANTARSIERO
10TH SENATORIAL DISTRICT

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THE STATE CAPITOL
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FAX: 717-783-5982

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Senate of Pennsylvania

COMMITTEES

ENVIRONMENTAL RESOURCES
& ENERGY,
DEMOCRATIC CHAIR
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CONSUMER PROTECTION
& PROFESSIONAL LICENSURE
JUDICIARY
LOCAL GOVERNMENT

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WEB: www.SenatorSteveSantarsiero.com

August 14, 2020

New Jersey Clean Air Council
Public Hearing held on July 30, 2020
Oral Testimony Submission

RE: Past, Present, and Future: Air Quality Around Our Ports and Airports

Dear New Jersey Clean Air Council,

I am concerned about the planned expansion of the Trenton-Mercer Airport (TTN) and the impact that it will have on the health and well-being of surrounding area residents.

Over the past twenty years, the Trenton-Mercer Airport (TTN) has succeeded in its desired expansion efforts through various segmented projects and to date, it continues to pursue large scale expansion under those same segmented methods. Regrettably, in doing so, the Trenton-Mercer Airport (TTN) has been able to bypass having to complete a cumulative and expansive Environmental Impact Study (EIS) that would have likely measured the impacts on all affected Mercer County (NJ) and Bucks County (PA) municipalities.

All of the segmented and individually considered projects currently being pursued are outlined and appear to be related and interdependent of the Trenton-Mercer Airport's (TTN) Master Plan of 2018. The Mercer County Website describes said Master Plan as such, "the Airport Master Plan is essentially a facility planning study that sets forth a conceptual framework for possible future airport development." The Airport Layout Plan (ALP), which is part of the Master Plan, identifies a proposed terminal expansion, the runway protection zone, and development of Parcel A of the Naval Air Warfare Center where there are known PFOS, VOC'S, mercury, and other contaminants.

Our concerns include, but are not limited to:

- Release of contaminants to surrounding tributaries and the Delaware River, which is a primary source of residential drinking water for millions of people;
- Increased aviation emissions and noise, which can cause heart attacks, asthma, pregnancy complications, learning, behavioral and psychiatric issues; and,
- Overall decreased quality of life and home values for nearby residents.

1/2

The Trenton-Mercer Airport (TTN) is currently pursuing a large number of projects individually, yet their cumulative impact should be considered rather than independent of one another. To date, there are roughly twenty-five projects that have either been approved, are in the process of seeking approval, or are planned in the near future. Without a cumulative Environmental Impact Study (EIS), it is entirely unclear how said projects may impact the local environment.

I request that all proposed expansion or renovation projects at the Trenton Mercer Airport (TTN) first undergo an extensive Environmental Impact Study (EIS) to determine the cumulative impact on noise, pollution, and safety to ensure the health and well-being of the area's surrounding residents.

Very truly yours,



Steven J. Santarsiero
10th Senatorial District

CC: Bucks Residents for Responsible Airport Management (BRRAM)
Residents for Regional Traffic Solutions, Inc. (RRTS)

PERRY WARREN, MEMBER
31ST LEGISLATIVE DISTRICT

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REPWARREN@PAHOUSE.NET



House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

Aug. 12, 2020

Ms. Heidi Jones
New Jersey DEP
436 E State St
Trenton, NJ 08608

Re: 2020 New Jersey Clean Air Council Public Hearing – Past, Present and Future: Air Quality Around Our Ports and Airports

Dear Ms. Jones

I represent the 31st Legislative District in Bucks County, Pennsylvania, the communities of Lower Makefield Township, Morrisville, Newtown Borough, Newtown Township and Yardley. Thank you for accepting comments in connection with the 2020 New Jersey Clean Air Council Public Hearing – Past, Present and Future: Air Quality Around Our Ports and Airports. I submit these comments specifically with respect to the Trenton-Mercer Airport.

The Trenton-Mercer Airport is located adjacent to a residential neighborhood, across the Delaware River, two to three miles from the suburban residential communities that I represent. In recent years a growing number of commercial flights have flown daily from and to Trenton-Mercer Airport, following flight patterns above our communities. Notwithstanding the recent increase in flights, the Trenton-Mercer Airport has proposed further expansion.

Many of our residents' air quality is impacted by the operations of the Trenton-Mercer Airport, and the air quality in our communities may be negatively impacted if the airport expands without comprehensive air pollution control measures.

A substantial concern in our communities is that studies and analyses of the environmental and pollution impacts of airport expansion have been "segmented" by virtue of the airport's separate expansion plans. I have received and reviewed letters from the Lower Makefield Township Board of Supervisors, the Residents for Regional Traffic Solutions, Inc., and the Bucks Residents for Responsible Airport Management. Each of these entities raises in their respective letters the issue of the "segmentation" of what appear to be "connected," or at the least "similar," actions, with respect to what amounts to a substantial expansion of the Trenton-Mercer Airport and its operations. The

cumulative impact of the past and future Trenton-Mercer Airport expansion may adversely affect the air quality of our residents.

The "segmentation" of the proposed expansion is evidenced by the separate public meetings conducted by the Trenton-Mercer Airport. Indeed, the Notice of the Trenton-Mercer Airport's November 27, 2018 "Public Meeting Environmental Assessment for the Runway Protection Zone and Obstruction Mitigation Project for Trenton Mercer Airport" included the parenthetical "(This is not the Terminal EA or Airport Master Plan Project.)" The assessment of the air quality currently emitted by the airport and its future construction projects should not be conducted in a vacuum. Rather, the assessment ought to be of all of the proposed expansion project(s) without segmentation. Our residents are affected by the entirety of the past, present and proposed future expansion of the airport and its operations and by the off-airport projects.

Accordingly, I join the Lower Makefield Township Board of Supervisors and the stakeholder organizations and other members of our community in requesting a more holistic evaluation, such as an Environmental Impact Statement, with respect to the totality of the past, present and future expansion of the airport and the airport's operations and of the off-airport projects. Only through such a holistic lens and examination can the actual cumulative impact of the Trenton-Mercer Airport upon our community and its residents be accurately assessed and any negative impact mitigated or eliminated.

Thank you for your consideration of these comments and the best interest of our community and the health, safety and welfare of our residents.

Sincerely,



State Representative, 31st Legislative District

District Office: 91 South Main Street, Yardley, PA 19067 | (215) 493-5420

Capitol Office: 27B East Wing, Harrisburg PA 17120-0031 | (717) 787-5475

www.pahouse.com/warren





Township of Lower Makefield

BOARD OF SUPERVISORS
Fredric K Weiss, Chair
Daniel R. Grenier, Vice Chair
James McCartney, Secretary
Suzanne S. Blundi, Treasurer
John B. Lewis, Supervisor

August 14, 2020

emailed to Heidi.Jones@dep.nj.gov

State of New Jersey
Clean Air Council
401 E State Street, 2nd Floor
PO Box 420
Trenton NJ 08625-0420

To the NJ Clean Air Council

The Pennsylvania Lower Makefield Township (LMT) Board of Supervisors would like to bring to the attention of the New Jersey Clean Air Council our community's air and water pollution concerns regarding \$177M of planned development projects at the Trenton-Mercer Airport in New Jersey. The projects are aimed at significantly expanding air traffic capacity and the airport is ignoring critical NEPA guidelines regarding the environmental impact of these changes as outlined in the LMT letter attached below.

The Trenton-Mercer Airport Master Plan has projected a low rate of air traffic growth of 1% over the period of 2015-2035. But their 2018 and 2019 flight operations already exceed the 2035 projection and the projects have not yet been carried out. Their plans are to increase the terminal by a factor of five while adding taxi ways and other infrastructure projects that will support significantly higher numbers of air operations. To base their environmental impact on an unrealistically low growth rate means the environmental assessments are disingenuous and not reflective of the air and water pollution levels the local NJ and PA communities will experience. Our concerns about these issues has led our Congressman Brian Fitzpatrick to write to the FAA objecting to the procedures being followed by the airport. This letter emphasizing water pollution concerns is also attached below. One of the key problems is that the FAA and airport authorities assert that all of these projects are disconnected and they do not recognize the cumulative impact that these projects will have on the local community and environment in terms of air, water and noise pollution.

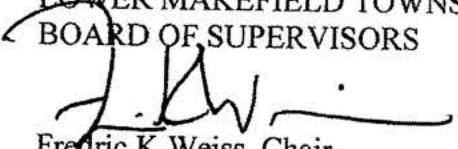
We request that the NJ CAC address these concerns to protect the health and quality of life of our collective citizens and our shared environment from a pollution

level that will be significantly higher than has been analyzed if these projects go through. We request that you push the NJ DEP to prepare a full environmental impact statement for the collection of planned projects.

We would be happy to answer questions you may have and support discussions with the council regarding these issues.

Very truly yours,

LOWER MAKEFIELD TOWNSHIP
BOARD OF SUPERVISORS


Fredric K Weiss, Chair

Attachments

LMT letter to TTN/Urban Engineers dated November 9, 2018

Congressman Fitzpatrick letter to FAA dated May 9, 2019

Congressman Fitzpatrick letter to FAA dated November 12, 2019

2/13



Exhibit II
(page 1 of 5)

Township of Lower Makefield

BOARD OF SUPERVISORS
John B. Lewis, Chairman
Fredric K Weiss, Vice Chairman
Kristin Tyler, Secretary
Daniel R. Grenier, Treasurer
Suzanne S. Biundi, Supervisor

November 9, 2018

TTN Terminal EA
c/o Urban Engineers, Inc.
530 Walnut St., 7th Floor
Philadelphia, PA 19106

Attn: Environmental Assessment

To Whom It May Concern:

The Lower Makefield Township (Township) Board of Supervisors (Board) is providing this letter as formal comments to the Federal Aviation Administration (FAA) and Mercer County with respect to the National Environmental Policy Act (NEPA) and its application to the ongoing Trenton-Mercer Airport Expansion Project (Project).

The proposed Project has the potential to negatively impact the residents, businesses, and community that comprise the Township as the flight path associated with the airport is directly above the Township. Any project that has the potential to negatively impact the Township is of great concern to the Board. It is our responsibility as the Board to advocate for the health, safety, and welfare of our citizens. As such, the Board has major concerns with the process followed for the Project and the potential impacts to our community.

These concerns were addressed in a meeting at Congressman Brian Fitzpatrick's office (PA-08) on June 18, 2018. Meeting attendees included representatives from the following groups:

- FAA,
- Congressman Fitzpatrick's office,
- Lower Makefield Township,
- Upper Makefield Township,
- Yardley Borough,
- Bucks Residents for Responsible Airport Management (BRRAM), and
- Residents for Regional Traffic Solutions, Inc. (RRTS).

Unfortunately, no representatives from the Project attended the meeting. The following Project proponents were invited to the meeting but did not attend:

5/1/78

KURT M. FERGUSON
Township Manager

1105 Edgewood Road
Yardley Pa 19067

3/13
A3/47
(267) 274-1100
Fax: (215) 493-3053
Website: www.lmt.org

- Trenton-Mercer Airport Manager Melinda Montgomery,
- Assistant Trenton-Mercer Airport Manager Dale Carman, and
- Mercer County Executive Brian Hughes.

Trenton-Mercer Airport Deputy Administrator Aaron Watson was also invited to attend but did not respond to the meeting invitation.

Please also note that the Township is aware of letters sent by local citizen stakeholders via certified mail to the Trenton-Mercer Airport management team that have been returned to sender without any acknowledgment of the contents of said letters. This is especially disconcerting as it shows a lack of willingness to discuss Project impacts with those stakeholders most affected by the Project and other activities at the Trenton-Mercer Airport.

The Board feels that an Environmental Assessment (EA) may not fulfill NEPA requirements for the proposed action. FAA's Order Withdrawing a FONSI/ROD dated February 23, 2006 includes the following footnote #3:

The analyses of Build Alternative 2 revealed that that alternative would likely cause sufficient noise impacts that would require the preparation of an Environmental Impact Statement (EIS).

The aforementioned footnote, along with specific language in FAA Orders 1050.1f and 5050.4B, calls into question whether or not an EA is the applicable level of review required for the proposed action. The approach that the Project is taking calls into question whether or not limiting the Project to an EA is the result of segmenting the Project from other connected actions previously completed at the airport and those actions planned for the future.

Per FAA Order 1050.1f, connected actions are discussed as follows:

Connected actions are closely related actions that: (a) automatically trigger other actions; (b) cannot or will not proceed unless other actions are taken previously or simultaneously; or (c) are interdependent parts of a larger action and depend on the larger action for their justification (see 40 CFR § 1508.25(a)(1), CEQ Regulations). Connected actions and other proposed actions or parts of proposed actions that are related to each other closely enough to be, in effect, a single course of action must be evaluated in the same EA or EIS (see 40 CFR §§ 1502.4(a) and 1508.25(a)(1), CEQ Regulations).

Importantly, the concept of segmentation when applied to connected actions, is also discussed in the same FAA Order:

A proposed action cannot be segmented by breaking it down into small component parts to attempt to reduce impacts (see 40 CFR § 1508.27(b)(7), CEQ Regulations).

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 [Handwritten signature]

It is the concern of the Board that the Project represents an action that has been segmented from other connected actions in violation of 40 CFR § 1508.27(b)(7), CEQ Regulations.

Due to the potential segmentation of the connected actions associated with the Project, the Project NEPA process must also consider those cumulative impacts associated with cumulative actions connected to the Project. Per 40 CFR § 1508.25(a)(2), CEQ Regulations, "[c]umulative actions should be discussed in the same EIS."

Even if the FAA somehow reaches the determination that all of the projects planned at the Trenton-Mercer Airport are not connected actions, the projects should at least be considered similar actions as defined in FAA Order 1050.1f. As such, the cumulative impacts of all actions should be considered in a single NEPA document:

Similar actions, such as those with common timing or geography, should be considered in the same environmental document when the best way to assess their combined impacts or reasonable alternatives to such actions is in a single document (see 40 CFR §§ 1502.4(b) through (c) and 1508.25(a)(3), CEQ Regulations).

Past, present, and future airport actions, whether they are connected or similar actions as defined in the Order, all also have cumulative impacts on the same affected environment. Per FAA Order 1050.1f, the "Affected Environment section should include critical background information of past, present, and reasonably foreseeable future actions."

Furthermore, it is the responsibility of Project representatives and the FAA to consider cumulative impacts of not only connected actions at the airport property but also those off-airport projects that may impact the surrounding communities when combined with on-airport projects as discussed in the two aforementioned FAA orders:

...impacts associated when analysts cumulatively consider the project's impacts with those of past, present and reasonably foreseeable actions on or off-airport (paragraph 9.q). those impacts may exceed one or more significant impact thresholds. Therefore, EA and EIS preparers must consider the impacts the airport project and the complex of past, present, and reasonably foreseeable projects affecting the same resources.

It is also of note that the FAA also provides an example of a how a terminal project, likely not dissimilar from the Project, must be considered in the NEPA document:

Note: Here, terminal area relocation is the principal action justifying the project, but the effects due to disrupting the community or other impacts due to highway or housing relocation must be part of the total proposal.

The Board formally requests that the Project addresses the issues discussed above and that they include a review of potential off-airport impacts to both New Jersey and Pennsylvania communities.

In addition, the Township's Trenton-Mercer Airport Review Panel (Panel) has provided the following questions and comments based on the Panel's review of the Project to date:

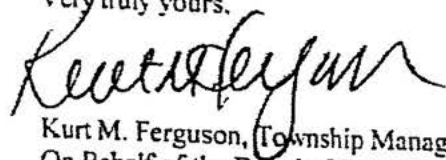
1. Airport planners must re-evaluate their forecasts, since the 2017 actuals are believed to be at the 2035 forecast already.
 - a. What are the 2017 actuals?
 - b. What is realistic for 2035 based on 2017 statistics?
 - c. How can they be reconciled?
2. Airport planners must be more specific about capacity planning.
3. Airport planners must specifically address quality of life issues, including but not limited to the following:
 - a. health and safety within our community due to air, water, land, and noise pollution;
 - b. vibration damage;
 - c. disruptions to sleep; and
 - d. disruptions to school activities.
4. Airport planner must include Pennsylvania communities in all analyses of surrounding areas.
5. Airport planners must detail the safety issues for the increased level of flights and what disaster plans are in place.
6. Airport planners must address the noise impacts of the increased traffic.
 - a. Reference is made to the FAA's Order Withdrawing a FONSI/ROD dated February 23, 2006, which includes footnote #3:
 - i. The analyses of Build Alternative 2 revealed that that alternative would likely cause sufficient noise impacts that would require the preparation of an Environmental Impact Statement (EIS).
7. Airport planners must consider the impact on property values and the tax base of surrounding communities in New Jersey and Pennsylvania
8. What evaluation has been done on cultural resources in the area? Under Section 106 of the National Historic Preservation Act, federal agencies must "account [for] the effect of their actions on structures eligible for inclusion in the National Register of Historic Places." Ill. Commerce Comm'n v. ICC, 848 F.2d 1246, 1261 (D.C. Cir. 1988). In fulfilling this obligation, agencies must consult with certain stakeholders in the potentially affected areas, including representatives of local governments. See 36 C.F.R. § 800.2(a)(4), (c)(3). If an agency determines that no historic structures will be adversely affected, it still has to "notify all consulting parties"—including a representative of the local government—and give them any relevant documentation. Id. § 800.5(c).
9. Airport planners must evaluate the cumulative impact of the activities at the airport over the planning period, not just the one incremental activity, to be valid and to reflect what is actually going on at the airport over the past years.
10. How many flights a day are possible at maximum utilization?
 - a. Based on maximum utilization, what are the potential cumulative impacts to surrounding communities?

In addition to the comments provided above, The Township incorporates by reference, and in their entirety, all other comments submitted by individuals, entities (public and private) and all

respondents, as if submitted by the Township as included in this response/these comments. Specifically, the Township directs Recipient's attention to the submissions and comments from Residents for Regional Traffic Solutions ("RTS"), a Lower Makefield-based interest group, focusing on issues related to transportation, infrastructure, and the impact of transportation-related decisions on the Township and regional populations.

The Board respectfully submits these comments and questions to the Project as part of the FAA's NEPA process. As stakeholders and an affected party, the Board, as a representative of the Township, looks forward to the Project's detailed responses. We hope that the airport can be a good neighbor.

Very truly yours,



Kurt M. Ferguson, Township Manager
On Behalf of the Board of Supervisors

KMF/bze
Enclosures

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7/13

6/2/17

Attachment G
(page 1 of 2)

BRIAN K. FITZPATRICK
1st District, Pennsylvania
COMMITTEE ON FOREIGN AFFAIRS
COMMISSION ON SECURITY AND
COOPERATION IN EUROPE
COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE



Congress of the United States
House of Representatives
Washington, DC 20515

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May 9, 2019

Elaine L. Chao
Secretary
U.S. Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

Dan Elwell
Acting Administrator
Federal Aviation Administration
800 Independence Ave SW
Washington, DC 20591

Dear Secretary Chao and Acting Administrator Elwell,

I am writing to you today regarding an issue of great concern within my district. The Trenton-Mercer Airport (TTN) is a county-owned airport located approximately four miles northwest of the City of Trenton in Rwing Township, Mercer County, New Jersey and less than four miles from the eastern edge of my district in Bucks County. The flight path and noise associated with TTN directly impact the constituents who reside in my district.

TTN has proposed and implemented several projects over the past 25 years with little input from the surrounding community as required by the National Environmental Policy Act of 1969 (NEPA) and the Federal Aviation Administration (FAA) Order 1050.1F - Environmental Impacts: Policies and Procedures.

Most recently, TTN has proposed a comprehensive Master Plan that calls for large-scale enhancements to the terminal, taxiway, and runway in an effort to increase usership at TTN. The plan would allow for larger planes and lower altitudes in addition to increasing the number of flights per day. Unfortunately, it appears TTN may have chosen to segment these projects in an effort to reduce the level of NEPA analysis required from an Environmental Impact Statement (EIS) that would require a broader scale cumulative impact analysis that would take into account potential impacts to my constituents in Pennsylvania to smaller, lesser-scale Environmental Assessments (EAs) for each project such that cumulative impacts and mitigation are not considered in a meaningful way.

The planned airport expansion has the potential to negatively impact the residents, businesses, and community that comprise PA-01 as the flight paths associated with the airport is directly above my district. Any project that has the potential to negatively impact the district is of great concern to me. It is my responsibility as its representative in Congress to advocate for the health, safety, and welfare of its citizens. As such, I have major concerns with the process followed by TTN and the potential impacts to our community. These concerns were addressed in a meeting

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Attachment G
(page 2 of 2)

held at my office on June 18, 2018. Several community leaders attended this meeting to voice their concerns and discuss potential solutions. Unfortunately, representatives from TTN and Mercer County did not attend the meeting.

I am asking that the appropriate level of NEPA analysis is conducted for the planned TTN expansion. A thorough review of TTN's historic projects and the FAA's methodology for considering cumulative impacts will show that segmentation, a concept not allowed for by NEPA regulations and the FAA's own orders, has taken place over many years.

I appreciate your attention to this matter and look forward to hearing from you.

Sincerely,


Brian Fitzpatrick
Member of Congress

9/13
4/1/94

BRIAN K. FITZPATRICK
1ST DISTRICT, PENNSYLVANIA

COMMITTEE ON FOREIGN AFFAIRS

COMMISSION ON SECURITY AND
COOPERATION IN EUROPE

COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE



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Congress of the United States
House of Representatives
Washington, DC 20515

November 12, 2019

Elaine L. Chao
U.S. Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

Dear Secretary Chao,

I am writing today in response to the letter I received from the Federal Aviation Administration dated August 6, 2019 regarding Trenton-Mercer Airport (TTN). In the letter, Acting Administrator Daniel K. Elwell indicated that the FAA has reviewed the projects at TTN and believes that the airport has not engaged in segmentation and has properly evaluated cumulative impacts. As stated in my letter addressed to the U.S. Department of Transportation dated May 9, 2019, I continue to be concerned that TTN has chosen to segment these projects to reduce the level of environmental study required. Additionally, I am greatly concerned that the TTN has overlooked potential existing ground water contamination while conducting their Environmental Assessment (EA). Therefore, I am requesting that the FAA review the mechanisms used by TTN to complete their Environmental Assessment to ensure that all environmental impacts, including threats to the safety of ground and drinking water, be evaluated.

The FAA, following the NEPA process, issued a FONSI/ROD for the TTN Runway Protection Zone and Obstruction Mitigation project after evaluating the Environmental Assessment. The TTN EA indicates that the proposed project will result in the clearing of 2.3 acres of trees within 100 feet of contaminated groundwater associated with the Naval Air Warfare Center (C&S Companies Environmental Assessment for Runway Protection Zones and Obstruction Mitigation page 3-24, July 2019). Although several contaminants are listed in the EA, there is no mention of the presence of PFOS/PFOA. However, according to a 2018 Congressional Brief by Maureen Sullivan, Deputy Assistant Secretary of Defense, the DoD monitored groundwater wells around the Naval Air Warfare Center Trenton and found that the majority tested near above the EPA LHA for PFOS/PFOA. Of the 38 wells tested, 23 tested above the EPA LHA with readings in the range of 178 – 27,800 PPT. (FY18 HASC on PFOS-PFOA, page 36) Considering the proximity of the wells to TTN, and how quickly PFOS/PFOA contaminations bioaccumulate, it is likely that the contaminants have spread to neighboring wells and ground water. Given the health risks associated with PFOS/PFOA exposure, it is critical that the environmental assessment for any project at TTN take these risks into account.

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It is my understanding that the spirit of the NEPA process is to ensure that project impacts are reviewed in their totality to ensure that proper environmental protections are maintained. I share the concern of my constituents that the TTN master plan and RPZ project impact studies are not in keeping with the spirit of NEPA. I urge the TTN management, their consultants and the FAA to consider cumulative impacts of not only connected actions at the airport property, but also those off-airport factors that may impact the surrounding communities.

I appreciate your attention to this matter and look forward to hearing from you.

Sincerely,

A handwritten signature in black ink that reads "Brian K. Fitzpatrick". The signature is written in a cursive style with a large, stylized initial "B".

Brian Fitzpatrick
Member of Congress

11/13

BRRAM

bucks residents for responsible airport management

25 S. Main St # 208

Yardley, PA 19067

Congressman Brian Fitzpatrick*
1717 Langhorne Newtown Rd., Suite 400
Langhorne, PA 19047
14 June 2019

Dear Congressman Fitzpatrick,

It's been almost a year, June 18, 2018, when representatives from BRRAM, area Bucks County Municipalities, FAA Officials from Washington, DC, and you sat down in your office to discuss the on-going development and expansion of the Trenton Mercer Airport (TTN). At that time, several issues were raised and there was much discussion regarding how to best mitigate this expansion to make it equitable as well as comply with environmental regulations. Some of our concerns included:

-Your constituents have been experiencing a dramatic increase in noise, vibrations, air pollution, sleep disruptions and there were/are safety concerns with the frequency of large commercial aircraft flying very low at all hours during takeoff and landing.

-District constituents are getting the brunt of the negative impacts from TTN operations and the TTN Airport and New Jersey politicians have failed to take steps to share these impacts equitably amongst surrounding NJ and PA communities, nor been willing to meet to discuss.

-The TTN Airport and NJ politicians have neglected to initiate a transparent and voluntary written request to the FAA asking that the FAA work with them on a FAR Part 150 Program to help with Noise Abatement.

-The TTN Airport and NJ politicians continue to disregard to comply with environmental regulations. Over the past 22+ years, segmentation has been used to allow unchecked airport expansion.

-TTN has been unwilling to perform an *inclusive* Environmental Impact Statement that would examine the cumulative impacts of past and proposed unchecked expansion on all affected NJ and PA communities

Since that time, we had several on-going meetings. Attendees have included Senator Santarsiero (convener) & representatives from his office, representatives from your office, State Representative Perry Warren, representatives from his office, Evan Stone (Executive Director of the Bucks County Planning Commission), Lowe Makefield Twp. (LMT) Board of Supervisors Chair Dan Grenier & members of the LMT TTN Airport Review Panel, Yardley Borough Council Members David Bria & Caroline Thompson and grass roots organizations. Some progress has been made and a cooperative atmosphere has prevailed. All efforts have been appreciated.

BRRAM's concern evolves around the speed in which things are moving. TTN continues to move ahead while stalling to meet with any officials. This is NOT a new tactic. We saw it many years ago. At that time, Representative Greenwood assertively reached out and kept the process moving with regards to

12/13

BRRAM

bucks residents for responsible airport management

25 S. Main St # 208

Yardley, PA 19067

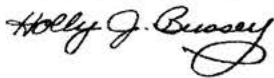
discussions with those in New Jersey. He pushed for answers with regards to process and accountability from a legislative and FAA perspective.

We need this type of intervention again now. There needs to be meetings and action demanding that TTN, NJ and the FAA provide accurate and open responses to issues like Return on Investment(ROI), Segmentation, adhering to the NEPA regulations and honoring the original statement FAA Statement of 2006 (foot note 3 on page 2 of the document "**ORDER WITHDRAWING Finding of No Significant Impact/Record of Decision dated February 23, 2006 for the Trenton- Mercer Airport (TTN), Terminal Replacement and Other Projects in the Capital Improvement Program**" that states, "*the analysis of Alternative Build 2 revealed that alternative would likely cause sufficient noise impacts that would require the preparation of an Environmental Impact Statement [EIS]*". This alternative Build 2 is the exact plan that TTN is going to implement.

With over 700 members of BRRAM we are concerned regarding the long-term outcome should this expansion continue to go unchecked and TTN continues to disregard due process of the law.

We sincerely hope that you will move forward with gusto and keep pressure on for results. We cannot afford to sit idly by. If we do, the airport that will be built will be not just regional, and the cone of impact for commercial aircraft flying over your constituents will grow exponentially. It will be too late to protect the welfare of all of us you represent. We hope to hear from you regarding an updated meeting and addressing the multiple issues of this concern soonest.

Respectfully submitted,



Holly J Bussey, President

PS: Received word (6/14/19 10:30am) about the introduction of H.R. 3001 – Quiet Communities Act of 2019 with Congressman Fitzpatrick as an original co-sponsor. This bill would reestablish the Office of Noise Abatement and Control in the U.S. EPA. Look forward to hearing more about this in particular: 1)Timing of passage?; 2) when it would be implemented; 3)impact on TTN development and expansion processes currently.

Cc: State Senator Steve Santarsiero*

Sue Simon, District Director for Congressman Fitzpatrick*

Kyle Melander, Director of Constituent Services for Congressman Fitzpatrick
State Representative Perry Warren*

Evan Stone, Executive Director of the Bucks County Planning Commission

Dan Grenier, Chairman, Lower Makefield Twp. (LMT) Board of Supervisors

David Bria and Caroline Thompson Yardley Borough Council Member

Dan O'Brien, Director of Local Government Relations for Senator Santarsiero

Dan Fagan, Local Government Assistant to Senator Santarsiero

Ryan Bevitz, Legislative Assistant to State Rep. Perry Warren

Richard Preston LMT TTN Review Panel

Susan Herman; President, Residents for Regional Traffic Solutions, Inc.

**denotes sent by certified mail. Others by email*

13/13

New Jersey Clean Air Council Public Hearing held on July 30, 2020:
RE: Past, Present, and Future: Air Quality Around Our Ports and Airports

Written Statement Submitted for the record.

Trenton Threatened Skies, Inc. is a non-profit 501(c)3, led by a group of concerned Mercer County residents, who have lived here for decades, loving, enjoying, and contributing in many ways to our community, with its beautiful green spaces, caring residents, peaceful atmosphere and organic farms. Our mission is to gather, review, analyze, and disseminate information regarding the Trenton-Mercer Airport, in Ewing, New Jersey, with respect to the environmental, public health, safety, and economic impacts of the proposed and future operations of the airport.

Emerging health data links aviation emissions and noise to heart attacks, asthma, pregnancy complications, learning, behavioral and psychiatric issues. Our home values can be expected to decrease up to 30% with increased commercial flight volume and our air and water quality will certainly deteriorate.

We have become increasingly alarmed because our local Mercer County authorities have been unresponsive to our concerns. Trenton Mercer Airport continues to seek and win approvals for a number of projects without regard to the cumulative impact on the environment of surrounding Mercer County communities and our public health. There are at least twenty-five (25) in-process individual projects that have either been approved, are in the process of seeking approval, or are planned in the near future as "unrelated" or "independent" improvements. All of these individually considered projects are outlined and proven to be related & interdependent in the Master Plan of 2018. The Airport Layout Plan (ALP), part of the Master Plan, clearly identifies a proposed terminal expansion, the runway protection zone, and development of Parcel A of the Naval Air Warfare Center where there are known PFOS, VOC's, mercury and other contaminants.

Prior to the CoVid 19 Pandemic, Trenton Mercer Airport's annual flight volume had already exceeded the 2035 estimates used to gain approval from the FAA for expansion and presented in public hearings in 2018. Mercer County residents are already subjected to a record number of overflights & vehicular through traffic and this local airport expansion will further degrade our already failing air quality.

The particles in airplane exhaust are directly tied to heart disease and asthma. Heavy metals and jet soot exhaust will put our local food at risk for contamination. Toxic emissions from planes flying below 900 feet are endangering visitors and wildlife at Mercer Meadows and Rosedale Park. Unregulated airplane exhaust impacts on our air quality has been seriously underestimated and the citizens of Mercer County implore the New Jersey Clean Air Council to vigorously oppose the expansion plans of the Trenton-Mercer Airport.

Sincerely,

Robin Karpf, M.D., President
Trenton Threatened Skies, Inc.
800 Denow Road, Suite C #375
Pennington, NJ 08534

BRRAM

25 S. Main St # 208

Yardley, PA 19067

bucks residents for responsible airport management

12 August 2020

TO: New Jersey Clean Air Council Public Hearing held on **July 30, 2020.**

Written Statement Submitted for the record

RE: Past, Present, and Future: Air Quality Around Our Ports and Airports

For over 25 years, BRRAM** has expressed concern about the environmental impacts of the Trenton-Mercer Airport on the health and well-being of the residents of the surrounding areas.

The newest health data links aviation emissions and noise to heart attacks, asthma, pregnancy complications, learning, behavioral and psychiatric issues.

Ultrafine particle exposure, produced from aircraft emissions, has been linked with adverse cardiovascular and respiratory health effects (and even possibly the risk of dementia (<https://deohs.washington.edu/hsmblog/trac-pollution-and-dementia>)). Studies have shown that airports can increase particle number concentrations up to 4-fold at 10 km downwind.

According to an article published in the Guardian, "New research has linked air pollution nanoparticles to brain cancer for the first time... Environmental risks like air pollution are not large in magnitude – their importance comes because everyone in the population is exposed," said Scott Weichenthal, at McGill University in Canada, who led the study. "So when you multiply these small risks by lots of people, all of sudden there can be lots of cases, which is meaningful, particularly given the fact that these tumors are often fatal."

When airports expand it is documented that home values can be expected to decrease up to 30%. Studies clearly show that air and water quality also deteriorate with airport expansion and increased air traffic.

Currently, the Trenton-Mercer Airport is doggedly pursuing a Master Plan to expand the airport, over the public outcry about health, noise and property value impacts.

Residents are increasingly alarmed about the large number of projects that TTN has sought approvals for, without regard to cumulative impact on public health and the environment in surrounding New Jersey & Pennsylvania communities. There are at least twenty-five (25) in-process individual projects

Pg 1/2

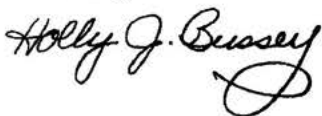
that have been identified that have either been approved, are in the process of seeking approval, or are planned in the near future as "unrelated" or "independent" improvements.

BRRAM opposes any form of expansion or renovation of TTN until the environmental issues of noise, pollution and safety are first identified and resolved. BRRAM believes that Trenton-Mercer Airport should perform a full Environmental Impact Statement (EIS) that would include not only the grounds of the airport, but the surrounding 10-mile radius that is impacted by the airport in both Pennsylvania and New Jersey.

Members of BRRAM from NJ and PA urge the New Jersey Clean Air Council to vigorously oppose the expansion plans (all projects) of the Trenton-Mercer Airport (TTN). Additionally, we implore that TTN be required to undergo rigorous environmental review (EIS).

Thank you for your kind attention.

Sincerely,



Holly J Bussey, President
BRRAM

***Bucks Residents for Responsible Airport Management (BRRAM) is a non-profit volunteer organization comprised of over 1,000 concerned citizens. BRRAM works with other organizations in both Pennsylvania and New Jersey, as an advocate for our residents, to help demand accountability from TTN and that TTN be a "good neighbor" respecting the environmental health, safety and well-being of all its neighbors.*

Cc: Sue Simon <sue.simon@mail.house.gov>,
kyle melander <kyle.melander@mail.house.gov>,
Santarsiero, Senator Steve" <Steve.santarsiero@pasenate.com>,
Rose Wuenschel <Rosemary.wuenschel@pasenate.com>,
Shannon.Sticker@pasenate.com
"Fagan, Dan" <dan.fagan@pasenate.com>,
"Rep. Perry Warren" <RepWarren@pahouse.net>,
ryan bevitiz <rbevitiz@pahouse.net>,
CommEllisMarseglia@buckscounty.org,
CommHarvie@buckscounty.org,
CommDiGirolamo@buckscounty.org,
"Stone, Evan" <estone@buckscounty.org>

pg 2/2

R.R.T.S.
Residents for Regional Traffic Solutions, Inc.
PO Box 285
Newtown, PA 18940
rrtsbucks5@gmail.com

New Jersey (NJ) Clean Air Council Public Hearing Held on July 30, 2020
RE: Past, Present, and Future: Air Quality Around Our Ports and Airports

WRITTEN TESTIMONY SUBMISSION (via email, in Microsoft Word)

August 12, 2020

Pages: 11-page cover letter

Attachments: 8, plus 1 VIDEO

BEFORE IT IS TOO LATE: Our "ASKS" of the NJ Clean Air Council & the NJ Department of Environmental Protection (NJ DEP)

1.) We implore the NJ Clean Air Council and the NJ DEP to vigorously & formally oppose all current and proposed expansion plans of Trenton-Mercer Airport (TTN), including the **Master Plan of 2018** that calls for:

- ...building a Passenger Terminal that is five (5) times the size of the current terminal,
- ...the **Runway Protection Zone & Obstruction Mitigation Project**, and
- ...twenty-five (25) individually-considered, segmented-out projects

These expansion plans will result in toxic air & water pollution that will cause irreparable harm to affected residents in Mercer County, NJ and Bucks County, PA.

TTN continues to recklessly move forward with plans to expand the airport substantially, with no regard for the water, air, wildlife, and other environment impacts on its citizens in the surrounding region. The former Naval Air Warfare Center in West Trenton, NJ (NAWC) is known to have groundwater polluted with PFAS* and other toxic chemicals. TTN's expansion plans will increase the water run-off through the former NAWC site and into the Delaware River, which is the drinking water supply for thousands of Mercer County and Bucks County citizens. **PFAS contamination of drinking water is linked to harming children's neurological development, kidney cancer and testicular cancer.**

** PFAS- per-and polyfluoroalkyl substances – are a class of man-made chemical compounds used in producing products such as non-stick cookware coatings, fire retardant furniture, and foam used in firefighting. PFOA, once used to make Teflon, and PFOS, once used in Scotchgard, are among the most widely known, yet there are hundreds more still being used in manufacturing.*

2.) We also implore the NJ Clean Air Council and the NJ DEP to develop an actionable response to meaningfully address the toxic air & water pollution that *ALREADY EXISTS TODAY*. TTN has *already* experienced large-scale expansion over the past 20 years, while skirting around having to do a Cumulative & Expansive Environmental Impact Statement (EIS) to measure the **cumulative impacts** on affected Mercer and Bucks County municipalities. The airport avoided having to do the EIS by breaking expansion into smaller projects, so that they were only subjected to narrow, isolated Environmental Assessments (EAs). This is segmentation, this is disingenuous, and this *already* threatens the health, safety & welfare of affected NJ and PA citizens.

SUMMARY

Residents in Mercer County (NJ) & Bucks County (PA) ask you to vigorously & formally oppose TTN's current & proposed expansion plans because...

1.) ...the airport's continued reckless, unchecked expansion will harm them & their families, as explained in the VIDEO at below link:

<https://www.youtube.com/watch?v=ZHU7m1Rzvyw&feature=youtu.be>

2.)...Health

- Airport plans will change storm drainage; there is known PFAS & other toxic chemical contamination of groundwater on airport property & the NAWC site, which could make TTN the next Flint [Michigan]. PFAS contamination of drinking water is linked with harming children's neurological development, kidney cancer and testicular cancer. (See attached Philadelphia Inquirer article titled *PFAS testing planned for 2 counties: Adults and children from Bucks and Montco are being sought for a national study on the chemicals.*)
- U.S. Senators Bob Menendez (NJ) & Bob Casey (PA) are amongst 19 senators who want the U.S. government to find out if exposure to PFAS chemicals can make people more vulnerable to coronavirus.
- The particles in airplane exhaust are directly tied to heart disease and asthma. The dangerous, invisible, microscopic exhaust particles travel up to ten (10) miles outside the flight path. Even if residents cannot see the planes, they are at risk.
- Eat Locally? Thousands of residents depend on fresh fruits, vegetables & meats grown in Lawrence & Hopewell Townships. Heavy metals & organic compounds in airplane exhaust put our food at risk of contamination.
- There is a wealth of data about the negative impact of noise on learning, which is compounded by both vibration and by exhaust, as well as noise on hearing loss, particularly in children.

Environment

- Researchers are equating unregulated airplane exhaust to an urban freeway network & are warning that the air quality impacts have been seriously underestimated.
- Toxic emissions from planes flying below 900 feet endanger joggers, cyclists, and wildlife at Mercer Meadows Park & the Pole Farm Bird Sanctuary.
- Mercer & Bucks County residents are already subject to a record number of overflights & vehicular through-traffic; local airport expansion will further degrade our poor air quality. [Mercer County (NJ) is rated "F" in Air Quality by the American Lung Association.]
- The long term effects of ongoing, increased emissions in close proximity to residential areas and watershed tributaries cannot be ignored.

Financial

- Home values are estimated to decrease up to 30% near an airport.
- Mercer County has invested ?\$\$\$ in the airport over the last 20 years. What financial benefit has accrued and/or is flowing to the county and its citizens?

Irresponsible Government

- Past & current expansion has been divided into smaller projects to avoid doing a Comprehensive & Expansive Environmental Impact Statement (EIS) that measures the **cumulative impacts** on **ALL** affected NJ and PA municipalities.
- The residents who have been, and will continue to be, hardest hit by the airport's success in skirting around doing the EIS, are those residing in Ewing Township (NJ) and the City of Trenton (NJ). Environmental Justice & Social Justice are not being practiced.
- There has been (a) a history of blatant disregard for authentically including the public in the decision-making process for airport projects, (b) an unconscionable lack of transparency and (c) an **intentional neglect** on the part of New Jersey politicians & the airport to do whatever it takes to protect the health, safety & welfare of affected NJ and PA citizens.
- Annual flight volume through early 2019 has already exceeded the 2035 flight estimates presented to the community by 17,238 take-off/landings, 16 YEARS EARLY & PRIOR TO TERMINAL EXPANSION
- Mercer County Freeholders just authorized a \$54,000 contract to market the airport in the middle of a pandemic, when the future demand for air travel is completely uncertain and many airlines may go out of business
- During the unprecedented pandemic with unemployment and decreased tax revenues, why are much-needed county \$ being spent on the airport?

BACKGROUND

1.) RRTS, along with BRRAM (Bucks Residents for Responsible Airport Management) and Mercer County - based grassroots groups, has been concerned with the expansion of TTN for over 20 years. TTN expanded “under the radar” throughout the past 20 years, by approving and implementing numerous individual projects, whose whole equaled large-scale expansion. By dividing the expansion into segments, TTN has avoided having to do the Cumulative & Expansive Environmental Impact Statement (EIS) that would measure its **cumulative impacts** on ALL affected Mercer County, NJ & Bucks County, PA municipalities.

2.) Recently, residents are alarmed by the large number of projects that TTN has sought approvals for, without regard to **cumulative impact** on the environment, surrounding NJ & PA communities, and public health. There are at least twenty-five (25) in-process individual projects that we can list that have either been approved, are in the process of seeking approval, or are planned in the near future as “unrelated” or “independent” improvements.

All of these segmented, individually- considered projects are *outlined and proven to be related & interdependent in the Master Plan of 2018*. The Mercer County Website describes the Master Plan as such: *“the Airport Master Plan is essentially a facility planning study that sets forth a conceptual framework for possible future airport development”*. The **Airport Layout Plan (ALP)**, part of the Master Plan, clearly identifies a proposed terminal expansion, the **Runway Protection Zone & Obstruction Mitigation Project (RPZ Project)**, and development of Parcel A of the Naval Air Warfare Center (NAWC) where there are known PFOS, VOCs, mercury and other contaminants.

The danger of considering these projects separately was demonstrated at the Mercer County Freeholder Board Webex meeting on 4/23/20 when the development of Parcel A of the NAWC was discussed. Airport attorney, Mr. Markind, referred to the remediation barrier on Parcel A as being “in total disrepair” several times. There are known PFOS, VOCs, mercury and other contaminants on Parcel A and the adjacent Parcel B. Both groundwater and surface water contamination have been reported. While Parcel B continues to be managed by the Navy, it appears that Parcel A is going to be cleaned up privately as part of the Flightserv lease agreement. It was not clear, and the Freeholders did not seem to know, who was overseeing & responsible for the project.

Residents are concerned that the **Parcel A FONSI** indicates that there is “no impact, due to no changes in storm water run-off”, ignoring the fact that the adjacent, massive **RPZ Project** changes are anticipated to affect storm run off by nearly 1.5 million (1, 500,000) gallons/year, as estimated by the Watershed Institute during the public comments portion of the **Environmental Assessment for the RPZ Project** (pg. P-200-202). This estimate relates only to **RPZ Project –associated** changes to landscape, and did not account for climate-change related increases in precipitation or the additional massive airport build-out, as described above.

It makes sense that the Parcel A remediation barrier should be repaired. It also makes sense that its ability to withstand both **RPZ Project – caused** and climate-related increases in storm drainage, be addressed well in advance of any **RPZ Project** structure removal. This is but one example of why these projects **MUST** be considered together.

3.) The attached 11/12/19 letter from PA Congressman Brian Fitzpatrick to the U.S. Department of Transportation **RE: the RPZ Project** states,

“...I continue to be concerned that TTN has chosen to segment these projects to reduce the level of environmental study required. Additionally, I am greatly concerned that TTN has overlooked potential existing groundwater contamination while conducting their Environmental Assessment (EA). Therefore, I am requesting that the FAA review the mechanisms used by TTN to complete their Environmental Assessment to ensure that all environmental impacts, including threats to the safety of ground and drinking water be evaluated.....Although several contaminants are listed in the EA, there is no mention of the presence of PFOS/PFOA. However, according to a 2018 Congressional Brief by Maureen Sullivan, Deputy Assistant Secretary of Defense, the DoD monitored groundwater wells around the Naval Air Warfare Center Trenton and found that the majority tested near above the EPA LHA for PFOS/ PFOA...Given the health risks associated with PFOS/PFOA exposure, it is critical that the environmental assessment for any project at TTN take these risks into account...”

RRTS has provided the Mercer County Freeholders with this letter several times during Public Comment at their meetings. Despite Congressman Fitzpatrick’s repeated communications regarding his concern that segmentation has occurred (and that there has not been appropriate environmental scrutiny of TTN’s cumulative impacts), it is the Federal Aviation Administration (FAA) who **routinely** responds that segmentation has not occurred. The problem is that the FAA is like the fox guarding the hen house. The agency has demonstrated that it is driven by a self-interested agenda that DOES NOT include protecting the safety & welfare of citizens. (See attached 2/21/20 Buchalter article titled Quiet Skies Congressional Caucus Gets Brush Off from FAA.)

4.) The Mercer County Freeholders maintain that the **RPZ Project** is motivated purely by safety concerns and will not change airport operations. This is boqus and disingenuous. Aviation Professionals have advised that IT DOES NOTHING to change the safety margin. WHAT IT DOES is enable more operations and better fleet mixes.

In Mercer County's own EA, in Chapter 4, it states,

"The existing runway length needs to be maintained or it will result in a loss of operations and/or operational restrictions for the Airbus 320/320neo and the Gulf stream IV/V during wet and slippery runway conditions."

We experience wet and slippery conditions right now – should those planes be operating from this airport now? If the Mercer Co. Freeholders truly thought that this project was purely for safety concerns (which they learned about in March 2015), they would be curtailing those operations right now. It is blatantly obvious that a key purpose for this project is to effectively lengthen the runway so that TTN can have the big jets safely fly in all conditions, move lower flying & heavily laden planes, and significantly increase airport operations.

5.) More than eighteen (18) months ago, TTN promised that there would be a Public Meeting held in Bucks County, PA for New Jersey & Pennsylvania residents to review the EA and the status of the multiple current & planned projects associated with the **Master Plan of 2018**. Recently, BRRAM formally gave public comment at a Mercer County Freeholder meeting to request that the meeting be held. BRRAM also sent a formal letter to Freeholder Chairman, Andrew Koontz, requesting same. Below is the 8/3/20 email response that BRRAM received from Chairman Koontz & Mercer Co. Administrator Lillian Nazzaro:

"We forwarded your communication to the County Administrator. Please see their response below.

LAURENTI, Mario

Confidential Aide to Freeholder Andrew Koontz

From: Nazzaro L. Lillian, Esq. <lnazzaro@mercercounty.org>

Sent: Monday, August 3, 2020 9:28 AM

To: Koontz, Andrew <akoontz@mercercounty.org>

Subject: RE: Mercer Freeholders Public Comment July 16 follow up - Request for Virtual Meeting on Trenton Mercer Airport

Chairman,

As previously discussed in Freeholder meetings, a public meeting will take place in Pennsylvania as soon as the EA is approved by the FAA. The County has every intention of going forward with the public meeting and residents of Pennsylvania will be advised accordingly. Finally, the meeting will most likely be a Tele Town hall meeting.

Thank you,

Lillian L. Nazzaro, Esq.

Mercer County Administrator"

This is unacceptable. It ignores the concerns of PA citizens and is not acting in good faith.

6.)At the 10/24/19 meeting of the Delaware Valley Regional Planning Commission (DVRPC) Board, RRTS gave public comment expressing the serious concerns that affected New Jersey & Pennsylvania residents have with the continued, unchecked expansion of TTN. The 11/17/19 GUEST OPINION that appeared in the local paper, THE ADVANCE OF BUCKS COUNTY, summarized our public comment. (See Guest Opinion titled *An open letter to the DVRPC on Trenton-Mercer Airport* in the attachment labeled **DVRPC-related communications**.)

In the 11/4/19 letter from Barry Seymour, DVRPC Executive Director, to Jennifer Solomon of the FAA (See 11/4/19 letter in attachment labeled **DVRPC-related communications**), it states,

“...As TTN continues to advance their improvement plans for the facility, residents of both Mercer County, NJ and neighboring Bucks County, PA have expressed concerns about potential environmental and social impacts created by any changes in facility operations. We strongly support the continued examination and consideration of these impacts and potential mitigation strategies, in accordance with the FAA guidelines...”

The DVRPC is disingenuous in its expression of concern for the health, safety & welfare of NJ and PA residents. **The following disturbing quotes are from DVRPC’s July 2014 publication titled 2040 Regional Airport System Plan (RASP), a plan that calls for expanding TTN far beyond an appropriate-sized local airport:**

On page 32, there’s a section titled “Trenton-Mercer (TTN), New Jersey” and the first sentence of the second paragraph states, *“The airport is marketing itself as an alternative to PHL [Philadelphia International Airport] and EWR [Newark’s Liberty International Airport], offering less hassle”.*

Page 1 is the “Executive Summary” which states this half way down the page, *“Therefore, the objectives for the 2040 RASP took these factors into account, and the following priorities were agreed upon by the RASP subcommittee: 1. Expand commercial air service capacity within the region...3. Sustain and improve infrastructure to attract more users...This report is being prepared with the support of the Federal Aviation Administration (FAA) ...”*

Page 3 states this in the first paragraph, *“ ‘Aviation’ to most people in the region will likely be associated with Philadelphia International Airport (PHL), the 11th busiest airport in the world (in terms of aircraft operations), but the Delaware Valley is also served by two other commercial service airports, Trenton-Mercer (TTN) and Wilmington (ILG)...”*

Page 4 is “Figure 1: Regional Airport System Map”. TTN has the same icon as Philadelphia International Airport (PHL) and Wilmington (ILG).

Halfway down page 5 it states, “*One specific economic aid for the region comes with the availability of U.S. Customs and Border Protection facilities at the region’s airports. All three commercial service airports – PHL, TTN, and ILG- have these facilities.*”

On page 7, it states this in the third paragraph, “*Commercial service airports serve scheduled service airlines, corporate aviation, and in the case of ILG and TTN, some military operations.*”

The DVRPC’s plan to expand TTN into a “booming airport” (as referenced on page 43 of DVRPC’s 2014 publication titled *[resilience]*), is inconsistent with its stated vision on its website Home Page on 2/19/20 which stated,

“The Delaware Valley Regional Planning Commission is the federally designated Metropolitan Planning Organization for a diverse nine-county region in two states: Bucks, Chester, Delaware, Montgomery, and Philadelphia in Pennsylvania; and Burlington, Camden, Gloucester, and Mercer in New Jersey.

DVRPC’s vision for the Greater Philadelphia Region is a prosperous, innovative, equitable, resilient, and sustainable region that increases mobility choices by investing in a safe and modern transportation system; that protects and preserves our natural resources while creating healthy communities; and that fosters greater opportunities for all.”

(See attachment labeled **DVRPC-related communications: DVRPC’s Vision on 2/19/20 website Home Page**)

The DVRPC should re-examine its plans to make TTN a “booming airport” and re-prioritize the importance of clean water to the region as one of the primary goals.

7.)It is unconscionable that New Jersey politicians, from the local level up through the Federal level, ignored the attached 9/30/19 letter from RRTS titled:

RE: IMMINENT PROPOSED EXPANSION OF TRENTON-MERCER AIRPORT (TTN): New Jersey & Pennsylvania residents living in municipalities surrounding TTN, worry that it will cause irreparable harm to their health, safety & welfare. The harm is likely to include, but not be limited to, irreparable damage to the water supply.

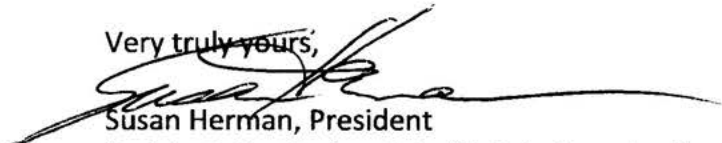
Our 9/30/19 letter is a formal, integral part of this written comment that we are submitting. We respectfully request that the NJ Clean Air Council & Commissioner McCabe read it in its entirety. If it is a problem that it is in pdf format, note that Commissioner McCabe received a hard copy of it via FedEx (signature required).

8.) Attached is our ORAL TESTIMONY given at the 7/30/20 Public Hearing (in Microsoft Word).

9.) FOR RRTS's USE ONLY, we have also attached a pdf comprised of our written and oral testimony for the 7/30/20 NJ Clean Air Council Public Hearing.

Thank you for the opportunity to comment.

Very truly yours,



Susan Herman, President
Residents for Regional Traffic Solutions, Inc.*

**Residents for Regional Traffic Solutions, Inc. (RRTS) is a non-profit organization founded in August, 2001. Its purpose is to engage in public awareness as to traffic issues in the Central Bucks County area. RRTS focuses on issues related to transportation, infrastructure and the impact of transportation-related decisions on regional populations. In the case of Trenton-Mercer Airport, the impacted regional populations are in Mercer County, NJ & Bucks County, PA.*

Attachments:

- RRTS WRITTEN TESTIMONY cover letter: 7/30/20 NJ Clean Air Council Hearing **(in Microsoft Word)**
- 7/13/20 Philadelphia Inquirer article: PFAS testing planned for 2 counties
- 11/12/19 letter from PA Congressman Fitzpatrick to U.S. DOT
- 2/21/20 Buchalter article: Quiet Skies Congressional Caucus Gets Brush Off from FAA
- DVRPC-related communications: 11/17/19 Guest Opinion in THE ADVANCE, 11/4/19 letter from DVRPC to FAA, DVRPC's Vision on 2/19/20 website Home Page
- 9/30/19 letter from Residents for Regional Traffic Solutions, Inc. (RRTS)
RE: IMMINENT PROPOSED EXPANSION OF TRENTON-MERCER AIRPORT (TTN):
New Jersey & Pennsylvania residents living in municipalities surrounding TTN, worry that it will cause irreparable harm to their health, safety & welfare. The harm is likely to include, but not be limited to, irreparable damage to the water supply.
- RRTS ORAL TESTIMONY: 7/30/20 NJ Clean Air Council Hearing **(in Microsoft Word)**
- FOR RRTS USE ONLY:** 7/30/20 NJ CAC Hearing, written and oral testimony pdf
- VIDEO titled Trenton Airport Expansion: Your Neighbors' Concerns (youtube link provided)

CC: All individuals/groups will receive this via email. Those asterisked will also receive it via Certified Mail, Return Receipt.

FEDERAL LEVEL:

U.S. Senator Bob Casey (PA)*
U.S. Senator Pat Toomey (PA)*
Congressman Brian Fitzpatrick (PA)*
U.S. Senator Bob Menendez (NJ)*
U.S. Senator Cory Booker (NJ)*
Congresswoman Bonnie Watson-Coleman (12th Cong. District-NJ)*
Congressman Tom Malinowski (7th Cong. District-NJ)*
Congressman Chris Smith (4th Cong. District-NJ)*
Congressional Quiet Skies Caucus

STATE LEVEL:

Governor Tom Wolf (PA)*
Secretary Patrick McDonnell, PA DEP*
Secretary Leslie Richards, PA DOT*
PA Attorney General Josh Shapiro*
Senator Steve Santarsiero (PA)*
State Representative Perry Warren (PA)*
Governor Phil Murphy (NJ)*
Commissioner Catherine McCabe, NJ DEP*
Commissioner Diane Gutierrez-Scaccetti, NJ DOT*
Senator Shirley Turner (D15-NJ)*
Senator Linda Greenstein (D14-NJ)*
Senator Christopher Batemen (D16-NJ)*

COUNTY LEVEL:

Mercer County Executive Brian Hughes*
Mercer Co. Freeholders (NJ): Cimino*, Koontz (chair)*, Cannon*, Walter*, Frisby*, Colavita*, Melker*
Bucks County Commissioners (PA): Ellis-Marseglia (chair)*, Harvie* DiGirolamo*

MUNICIPAL LEVEL:

Members of Councils/ Committees in Mercer County (NJ):

East Windsor Twp.: c/o president (pres.)*
Ewing Twp.: c/o president*
Hamilton Twp.: c/o pres.*
Borough of Hightstown: c/o pres.*
Hopewell Borough: c/o pres.*
Hopewell Twp.: c/o pres.*
Lawrence Twp.: c/o pres.*
Borough of Pennington: c/o pres.*
Princeton: c/o pres.*
Robbinsville Twp.: c/o pres.*
City of Trenton: c/o pres.*
West Windsor Twp.: c/o pres.*

Members of Councils/ Boards of Supervisors (PA):

Langhorne Borough Council: c/o pres.*
Lower Makefield Twp. Board of Supervisors (BOS): Grenier*, Weiss (chair)*, Lewis*, Blundi*, McCartney*
Middletown Twp. BOS: c/o chair*
Morrisville Borough Council: c/o pres.*
Newtown Borough Council: c/o pres.*
Newtown Twp. BOS: Calabro (chair)*, Oxley, Mack, Davis, Fisher
Upper Makefield Twp. BOS: c/o chair*
Yardley Borough Council: c/o Bria (pres.)*
Falls Twp. BOS: c/o chair*

Sue Simon
Kyle Melander
Rose Wuenschel
Shannon Sticker
Dan Fagan
Ryan Bevitz
Ruth Foster (Director; NJ DEP, Office of Permit Coordination & Environmental Review)*
Barry Seymour; Executive Director, DVRPC*
DVRPC Board members
John Ward, DVRPC Deputy Executive Director*
Patty Elkis, DVRPC Director of Planning*
Evan Stone; Executive Director, Bucks County Planning Commission*
Lower Makefield Township (LMT) Manager, Kurt Ferguson*
LMT Solicitor, David Truelove*
LMT Trenton-Mercer Airport Review Panel
Bucks Residents for Responsible Airport Management (c/o President, Holly Bussey)
Trenton Threatened Skies
Mercer Quiet Skies
Residents for Regional Traffic Solutions, Inc.
William Penn Foundation*
Water Resources Association of the Delaware River Basin*
Partnership for the Delaware Estuary*
Buxmont Coalition for Safer Water*
Delaware River Keepers
Delaware/Raritan Canal Commission
Pennsylvania Canal Society
Canal Society of New Jersey
NJ Sierra Club
PA Sierra Club
Clean Air Council (Philadelphia, PA)
NJ Audubon Society
Bucks County Audubon Society
Watershed Institute*

INTRODUCTION

I am writing to you as a medical doctor and concerned Mercer County resident, to outline the significant risk to public health that increased and unregulated aviation emissions have on the residents of our state. The convergence of several detrimental factors demand consideration: 1) the identification of Ultrafine Particulate Matter (UFP, diameter <100 nanometers nm) specific to aviation exhaust, 2) significant contribution of UFP to perilous and costly health conditions, 3) increased flight volume, including overflights, in a background of poor ambient air quality, 4) the lack of regulation regarding Greenhouse Gases (GHG) emitted from aviation sources. There are numerous other pollutants and issues related to aviation emissions, but I will focus on these four concerns which have been poorly considered as the Trenton Airport seeks to massively expand operations.

AIRPLANE EMISSIONS

In 2014, a groundbreaking study using mobile air quality monitors demonstrated that particulate matter from airplane emissions spread 10 miles outside of the flight path.¹ This was not just for takeoff and landings, as previously presumed, but for overflights as well. Specifically, pollutants measured 4-5 fold at 6 miles downwind and persisted 2-fold at 10 miles downwind. The authors of the study concluded that air traffic exhaust was the “same general magnitude as the entire urban freeway network”² occurring overhead, raining down on residents. Their findings “indicated that the air quality impact areas of major airports may have been seriously underestimated”.³

Until recently, studies regarding Traffic Related Air Pollution (TRAP) and Particulate Matter (PM 2.5, diameter <2.5 micrometers (μm), did not specifically address smaller Ultrafine Particles (UFP, diameter <100 nanometers nm) or the specific contribution of aviation-origin emissions.⁴ The highly significant Mov-Up Study, published in December 2019, utilized mobile air sensors to specifically delineate road vehicle exhaust from airplane emissions.⁵ The researchers were able to identify a fingerprint of UFP specifically emitted by planes. The Mov-Up researchers found that the size and velocity with which aviation UFPs are thrust from jet engines, allows for much further spread than heavier ground vehicle emissions, which fall to the surface a relatively short distance from roadways. Additionally, the velocity with which UFPs travel prevents adherence to other particles, allowing the UFPs to reach the earth unchanged in size. The significance of UFP's <100 nm size is demonstrated in UFP's ability to permeate

human tissue barriers far more efficiently than other PM; emerging studies correlate UFP with significant tissue inflammation, injury and risk, as outlined in the health section below.

Related studies have shown that the size and velocity of aviation-emitted UFPs allow for concentration indoors,⁶ and the concentrations in homes of aviation-origin UFP and NO₂ were comparable to or exceeded near-road regulatory monitors.⁷ This same report also demonstrated the inadequacy of stationary air quality monitors to accurately estimate residential exposures. Stationary air quality monitors are currently utilized in New Jersey.

The exact composition of aviation-emitted UFP will be further delineated in the ongoing Mov-Up Part 2: "The Characterization of Urban Nanoparticles".⁸ There is concern that aviation related UFPs contain heavy metals, as demonstrated by a study examining soil contamination surrounding the international airport in Delhi, India.⁹ Of additional concern is the recent report of aviation-originated emission organophosphates in the water, soil and vegetation surrounding airports.¹⁰

PUBLIC HEALTH

As a medical doctor, I am overwhelmed and alarmed by mounting environmental toxicology data implicating serious harm related to airplane emissions. We have known for a long time about the significant harms to human health of poor ambient air quality. Extensive correlations have been demonstrated in diverse illnesses, impacting all segments of the population. Air quality related illnesses include cancer,¹¹ asthma and non-smoking COPD,¹² Heart Attacks,¹³ poor cognition,¹⁴ Sudden Infant Death Syndrome (SIDS),¹⁵ Neonatal ICU admissions and Preterm delivery.¹⁶

Recent data linking TRAP to Pregnancy related complications such as Preeclampsia and Gestational Hypertension, is particularly alarming given the Maternal Mortality crisis occurring nationwide.¹⁷ A well-designed study documented airport delays and taxiing time to an increased incidence of hospitalizations for asthma and heart attacks.¹⁸

Data is now emerging regarding the specific risk of UFPs. UFPs cause unique risk to health because their small size allows passage across tissue barriers, including the difficult to permeate blood-brain barrier. Recent NIH studies have demonstrated UFP exposure related brain tumors,¹⁹ asthma,²⁰ heart attacks, mental health issues, including teen ER visits for anxiety and suicidal ideation,²¹ and various pregnancy complications, specifically preterm birth.²² Babies and

children may be particularly susceptible because they accumulate UFPs at higher relative concentrations than adults.²³

Recent COVID-19 related public health trends, specifically decreased preterm birth²⁴ and increased COVID-19 mortality for residents in areas of poor air quality,²⁵ are two tangible examples of the real-time consequences of air quality. It is imperative that we quantify the emissions pollutant volume and dispersal patterns with regard to public health and environmental injustice.

FLIGHT VOLUME

New Jersey residents' risk from aviation-emission toxicity are compounded because of our poor ambient air quality, our population density and our location. We are the unfortunate recipients of massive pass-through vehicular²⁶ and aviation overflight exhaust. Our location along the northeast corridor makes us specifically susceptible to exhaust generated by residents of other states passing through and flying over en route to out of state destinations. The burden of our impact was increased with the FAA's 2007 tristate metropolitan area airspace redesign²⁷ which sought to streamline routes into condensed sky highways: *"Each layer includes a finite piece of airspace defined by lower and upper altitude limits and defined geographic boundaries"*. The Redesign, by delineating specific, narrowed lanes of travel, allows for increased volume and additional flight routes: *"new departure gates and arrival posts would permit the development of new routes in the airspace structure. Expanding the boundaries of the terminal airspace environment would permit less restrictive separation rules to be used in a larger volume of airspace"*. The net impact of the redesign was not only to increase flight volume to/from New Jersey, but also to dramatically increase overflights.²⁸ The resultant expansion of air traffic over the past decade, prior to the COVID-19 pandemic, has contributed to New Jersey's poor air quality and public health issues.

The NY-NJ-PHL Airspace redesign established the local framework for the FAA's NextGen system, which transitions airspace to satellite-based navigation nationwide.²⁹ The FAA is unapologetic in their goal of drastically increasing flight volume. As James Eck, the Assistant Administrator for NextGen commented: *"overarching objectives for the future remain the same — maximizing airspace capacity with more sophisticated and seamlessly integrated information about the future position of aircraft at a given time"*. NextGen has already been implemented at major US airports, with a phased approach for nationwide integration by 2025. NextGen uses satellite guided positioning to reduce mandatory distances, including vertical distances, between

planes and to expand multiple runway operations. Thus, airport operations can be drastically increased. While this has been skillfully accomplished in the name of “aviation safety” and efficiency, the FAA’s description of NextGen as “*a collaborative effort between the FAA and the aviation community*” underscores the fact that the FAA has not considered the safety, health or air quality of citizens on the ground. In fact, the FAA’s primer on aviation emissions, impacts and mitigation maintains “Aviation’s contribution to a region’s air emissions inventory is generally small”.³⁰ Because aviation emissions have been both minimally studied and minimally regulated, residents are being crop-dusted with invisible turbine exhaust and dangerous pollutants, the health impacts of which are only now being recognized.

CLIMATE

Aviation’s contribution to greenhouse gases is unregulated. Thus, the alarming speed at which aviation negatively impacts climate change has also been unrecognized.³¹ Although the EPA ruled in 2016 that “Greenhouse Gas Emissions From Aircraft Cause or Contribute to Air Pollution That May Reasonably Be Anticipated To Endanger Public Health and Welfare” no regulations were proposed.³² Only recently have Aviation related GHG Emission Standards for Aircraft been proposed.³³

The following assessment in the TTN Airport Runway Protection Zone Environmental Assessment emphasizes the veracity and magnitude of this issue:

1.4.2 Greenhouse Gas Pollutants: Since there are no federal or state standards for aviation-related GHG, there is no significant impact threshold for GHGs.”³⁴.

The same report includes 5 pages detailing *construction* vehicle emissions and duration of use during the Runway Protection Zone obstacle clearance, yet there is no analysis of anticipated emissions after completion of RPZ and other related Master Plan projects (new 4x current capacity passenger terminal, new corporate terminal, Flightserv terminal, redesigned taxiways for increased efficiency and flight operations). Projected airport operations used in the analysis are extremely underestimated: total operations calculations for 2035³⁵ had already been surpassed by 2019.³⁶ One would anticipate increased on-ground facility operations, increased passenger car volume, and significantly increased flight operations after the airport has realized its master plan³⁷ expansion and is working at full capacity. The report distracts from the continued impact that TTN will have on the local environment and climate change by extensively reviewing construction equipment during the finite, short-term obstacle clearance of the RPZ. The long-term, ongoing impact of the finished cumulative master plan projects, which

promise and threaten to be utilized at increasing capacities for decades to come, remains *unexamined*.

The disregard for air quality impacts was demonstrated with the onset of the coronavirus pandemic when major commercial airlines flew nearly empty so as to not lose their preferred scheduled slots.³⁸ The FAA promoted this practice, without regard for the impact on the environment and without promoting coordination and efficiency between airlines. Thus, airlines received billions in CARES grant bailout money without any incentives to reduce their environmental impact.

The complex interaction between climate and pollution is a self-perpetuating and escalating relationship. As some in the federal government have taken a pro-industry stance by withdrawing from the Paris Accord and stripping away the basic tenets of the Clean Air Act, it is up to politicians and government agencies at the state level to continue to be responsible. I appreciate the leadership Governor Murphy has taken with his Climate Bill, Executive Order No. 100. While air travel will recover over the next decade, it is imperative that we proceed as deliberately as possible with regard to the balance between the benefits of travel and our commitment to preserving our environment.

Thank you for your consideration,

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**New Jersey Clean Air Council Public Hearing held on July 30, 2020:
RE: Past, Present, and Future: Air Quality Around Our Ports and Airports**

ORAL TESTIMONY SUBMISSION: July 30, 2020 # Pages: 2

I am Susan Herman, President of Residents for Regional Traffic Solutions, Inc. (a.k.a. RRTS), P.O. Box 285, Newtown, PA 18940.*

Our comments are about Trenton-Mercer Airport (a.k.a. TTN). Our organization, along with BRRAM (Bucks Residents for Responsible Airport Management) and Mercer County-based grassroots groups, has been concerned with the expansion of TTN for over 20-plus years. TTN expanded “under the radar” throughout the past 20-plus years, by approving & implementing numerous individual projects, whose whole equaled large-scale expansion. By dividing the expansion into “segments”, TTN has avoided having to do the Cumulative & Expansive Environmental Impact Statement (EIS) that would measure its **true negative impacts** on all affected Mercer County (NJ) and Bucks County (PA) municipalities.

Recently, residents are increasingly alarmed about the large number of projects that TTN has sought approvals for, without regard to **cumulative impact** on the environment, surrounding New Jersey & Pennsylvania communities, and public health. There are at least twenty-five (25) in-process individual projects that we can list that have either been approved, are in the process of seeking approval, or are planned in the near future as “unrelated” or “independent” improvements.

*Residents for Regional Traffic Solutions, Inc. (RRTS) is a non-profit organization founded in August, 2001. Its purpose is to engage in public awareness as to traffic issues in the Central Bucks County area. RRTS focuses on issues related to transportation, infrastructure and the impact of transportation-related decisions on regional populations. In the case of Trenton-Mercer Airport, the impacted regional populations are in Mercer County, New Jersey and Bucks County, Pennsylvania.

All of these segmented, individually- considered projects are **outlined and proven to be related & interdependent in the Master Plan of 2018**. The Mercer County Website describes the Master Plan as such: *"the Airport Master Plan is essentially a facility planning study that sets forth a conceptual framework for possible future airport development"*. The **Airport Layout Plan (ALP)**, part of the Master Plan, clearly identifies a proposed terminal expansion, the runway protection zone, and development of Parcel A of the Naval Air Warfare Center where there are known PFOS, VOC's, mercury and other contaminants.

The residents who have been, and will continue to be, hardest hit by the airport's success in skirting around doing a Cumulative & Expansive EIS [of all affected New Jersey and Pennsylvania municipalities], are those residing in Ewing Township and the City of Trenton. In Dr. Nicky Sheats' earlier presentation, he described the vulnerability of communities such as these and our obligation to study cumulative impacts and practice Environmental Justice & Social Justice.

It is unconscionable that New Jersey politicians - from the local up through the Federal level - ignored RRTS's September 30, 2019 letter which stated that residents are worried that the continued reckless, unchecked expansion of TTN will cause irreparable harm to our health, safety and welfare. The harm will include, but not be limited to, potential PFOS contamination of our water supply.*

Today, presenters have talked about the health impacts of air pollution around our ports and airports. Researchers are equating unregulated airplane exhaust to an urban freeway network & are warning that the air quality impacts have been seriously underestimated. PFOS contamination of drinking water is linked to harming children's neurological development, kidney cancer, and testicular cancer. The health impacts of the coronavirus - combined with those caused by air pollution and contaminated drinking water - will be devastating.

We implore the New Jersey Clean Air Council to vigorously oppose the expansion plans of the Trenton-Mercer Airport (including all individually-considered projects) that will potentially increase air and water pollution in New Jersey and Pennsylvania.

* RRTS's September 30, 2019 letter will be included in our written testimony, along with a written version of this oral testimony. The subject of our September 30, 2019 letter is **RE: IMMINENT PROPOSED EXPANSION OF TRENTON-MERCER AIRPORT (TTN): New Jersey & Pennsylvania residents living in municipalities surrounding TTN, worry that it will cause irreparable harm to their health, safety & welfare. The harm is likely to include, but not be limited to, irreparable damage to the water supply.**

ORAL TESTIMONY
NJ Clean Air Council 7/30/20 Hearing:

page 2 of 2



Cars drive through rain puddles along the White Horse Pike in Lindenwold as Tropical Storm Fay passes through on Friday.

PFAS testing planned for 2 counties

Adults and children from Bucks and Montco are being sought for a national study on the chemicals.

By Frank Kummer
STAFF WRITER

Starting this fall, Pennsylvania and federal health officials hope to recruit 1,000 adults and 300 children in Bucks and Montgomery Counties for a national study on the impacts of PFAS chemicals on thyroids, cholesterol levels, kidneys, immune systems, livers, and even behavioral problems.

It's another chance for residents of Horsham, Warminster, and Warrington Townships whose drinking water was contaminated by nearby military bases to get their blood tested.

As in a 2018 pilot test that preceded the national project, the testing won't look for links to cancer, and at least to start, will not be focused on people who once worked at the Naval Air Warfare Center Warminster and Naval Air Station Willow Grove, where the "forever chemicals" leached off the bases from firefighting foam.

Rather, the study will seek volunteers from among the residents of the same communities, which are adjacent to the bases.

PFAS — per- and polyfluoroalkyl substances — are a class of man-made chemical compounds used in producing products such as nonstick cookware coatings, fire retardant furniture, and foam used in firefighting. PFOA, once used to make Teflon, and PFOS, once used in Scotchgard, are among the most widely known, yet there are hundreds more still being used in manufacturing.

Though the full health effects of PFAS are still being studied, known impact includes increased cancer risk, hormonal

interference, infertility, increased cholesterol, and issues surrounding growth, learning, and behavior of infants and children, according to the Pennsylvania Department of Health.

Officials held a two-hour Zoom meeting Thursday night with residents about the upcoming PFAS National Multi-Site Health Studies being conducted by the U.S. Centers for Disease Control and Prevention (CDC) and Agency for Toxic Substances and Disease Registry (ATSDR) on effects of PFAS exposure. The study includes participants from six states, including Pennsylvania and New Jersey.

The national study presents the opportunity for more Horsham, Warrington, and Warminster residents to get their blood tested, after many had already taken part in an earlier pilot study. That 2018 study showed residents tested had elevated levels of PFAS in their blood compared with average Americans.

New results from that pilot study released in a Department of Health report ahead of Thursday's meeting indicated follow-up tests in 2019 didn't reveal significant links between levels of PFAS in dust or water in 14 homes, and levels of PFAS in the blood of the homes' occupants.

The exception was for PFNA, one type of the compound: There was a link between PFNA in one home's tap water with a resident's blood level.

Representatives of the Pennsylvania Department of Health, ATSDR, Buxmont Coalition, Temple, and Brown Universities, and the nonprofit research

group RTI International outlined the parameters of the blood and urine tests set to begin for the national study later this year.

"You're a really highly engaged community," Sharon Watkins, chief epidemiologist for the DOH, said Thursday on Zoom, explaining why the area was chosen to participate. She cited the history and level of exposure as a primary reason.

Residents posted a range of questions, such as who will be allowed to participate, whether PFAS is linked to higher risks with COVID-19 (not immediately, they were told), and which communities would be included in the study.

The testing would include:

- ▶ Households in areas closest to the military bases subjected to greater concentrations of PFAS over longer periods of time.

- ▶ Adults 18 and older and children 4-17.

- ▶ About 235 residents who already participated in a pilot study that looked at the compounds in blood and urine, as well as dust and drinking water in homes.

It would exclude:

- ▶ People who haven't been exposed to PFAS for 15 years or longer.

- ▶ People exposed to the chemicals through work.

- ▶ Prisoners or those under house arrest.

Officials hope this fall to recruit volunteers for blood and urine testing. A full public analysis won't be complete until spring 2024, though participants will get their own results much earlier.

A headquarters will be set up in the area for the yearlong program, staffed with an office manager, field interviewers, clin-

ical interviewers, phlebotomists, a nursing assistant, and laboratory technician.

Adult volunteers will be paid \$50 per blood or urine test, and children will be paid \$75. Children under 5 will complete behavioral tests up to 90 minutes long that will include memory games, item sorting, puzzles, and reactions to photos.

A website, pafas.rti.org, which is not yet active, will provide further information.

Answering a question from an anonymous military veteran and area resident, Ted Lillys, an environmental engineer with RTI, said there was no plan to look specifically at base workers, but testing could be expanded in the future.

Area resident William Gildea-Walker asked if there would be any additional funding to study links between cancer and PFAS.

Resa Jones, chair of Temple's epidemiology and biostatistics department, said the group might look at the possibility in the future.

The ATSDR and Pennsylvania DOH looked at cancer cases in the area from 1985 through 2013 but did not find clusters that might be expected with an environmental cause.

Correne Kristiansen, chief of staff for State Sen. Maria Collett, who represents parts of Montgomery and Bucks Counties, asked if the group will look at potential links between PFAS levels and severity of COVID-19.

Officials said that is not included in the initial study parameters, but might be added.

✉ fkummer@inquirer.com

☎ 215-854-2329

📧 FrankKummer

Staff writer Justine McDaniel contributed to this article.

Atlantic City man slain in Egg Harbor

By Rita Giordano
STAFF WRITER

A 29-year-old Atlantic City man was found shot to death on an Egg Harbor Township street Satur-





Alison Hastings <ahastings@dvrpc.org>

Fwd: Trenton Airport Expansion likely to poison the Delaware River

2 messages

Barry Seymour <bseymour@dvrpc.org>

Mon, Oct 5, 2020 at 11:56 AM

To: Alison Hastings <ahastings@dvrpc.org>, Michael Ruane <mruane@dvrpc.org>

Alison/Mike - We will need some sort of response on this.

Barry Seymour | Executive Director

(Pronouns: he/him/his)

Delaware Valley Regional Planning Commission

190 N Independence Mall West, 8th Floor

Philadelphia, PA 19106-1520

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----- Forwarded message -----

From: **susan herman** <rtsbucks5@gmail.com>

Date: Mon, Oct 5, 2020 at 11:44 AM

Subject: Trenton Airport Expansion likely to poison the Delaware River

To: <Andrew.Simpson@phila.gov>, <BQuinde@njtransit.com>, <Brian.Leckie@dot.nj.gov>, <Cheryl.Goldman@dot.nj.gov>, <Christopher.Puchalsky@phila.gov>, <CommHarvie@buckscounty.org>, <DEBrown@septa.org>, Daniel <dan.kelly@nj.gov>, <David.Caulfield@dep.nj.gov>, <Donna.Zucchetti@dot.nj.gov>, <Elizabeth.Semple@dep.nj.gov>, <Eugene.Porochniak@dot.gov>, <JHolton@septa.org>, <Jennifer.Crobak@dot.gov>, <John.Wolick@camdencounty.com>, <Kelley.Yemen@phila.gov>, <MZOCHOWSKI@mercercounty.org>, <MaddenK@co.delaware.pa.us>, <Mayor@ci.camden.nj.us>, <Melanie.Willoughby@sos.nj.gov>, <Mike.Russo@dot.state.nj.us>, <PA_Webmanager@hud.gov>, <Richard.brown@sos.nj.gov>, <Rudy.Rodas@nj.gov>, <Stephen.Fowler@dot.nj.gov>, Stone, Evan <estone@buckscounty.org>, <TSteinitz@septa.org>, <abobbitt@trentonnj.org>, <abockis@saoul.com>, <ahartzell@pa.gov>, <akpayne@buckscounty.org>, <alicia.nolan@dot.gov>, <alifurman@pa.gov>, <andrew.levecchia@camdencounty.com>, <andrew.swords@dot.state.nj.us>, <anmiller@ci.camden.nj.us>, <anne.kelly@phila.gov>, <b_holcomb@drpa.org>, <barry.ableman@sos.state.nj.us>, <bdelisle@trentonnj.org>, <bdonovan@chesco.org>, <becoat.gregory@epa.gov>, <bheigel@paturmpike.com>, <bhughes@mercercounty.org>, <bmcfadden@septa.org>, <boleary@chesco.org>, <bproska@trafficpd.com>, <brandon.r.porinchak@hud.gov>, <brian.goodson@dot.gov>, <brownc@co.delaware.pa.us>, <bstyle@chesco.org>, <cgreenwood@ceocouncilforgrowth.com>, <ckastrenakes@gmtma.org>, <commissioner@dep.nj.gov>, <cpregosch@buckscounty.org>, <crobinson@trentonnj.org>, <cstuart@montcopa.org>, <cthomas@co.burlington.nj.us>, <daniel.kelly@nj.gov>, <darin.gatti@phila.gov>, <david.kanthor@phila.gov>, <diane.scaccetti@dot.nj.gov>, <donna.rendeiro@sos.nj.gov>, <dspence@co.gloucester.nj.us>, <eamsmith@septa.org>, <edwillia@ci.camden.nj.us>, <eleanor.sharpe@phila.gov>, <equinn@chesco.org>, <eric.powers@dot.nj.gov>, <eroe@chesco.org>, <evizza@ceocouncilforgrowth.com>, <fharwell13@gmail.com>, <fmw@mwfo.com>, <gburritt@admarble.com>, <gfallat@mercercounty.org>, <hastingstm@co.delaware.pa.us>, <hilll@co.delaware.pa.us>, <hsimmons@co.gloucester.nj.us>, <jacqueline.o.davis@phila.gov>, <james.vari@dot.state.nj.us>, <jbarr@septa.org>, <jdavis@paturmpike.com>, <jdrink@drpa.org>, <jeannette.brugger@phila.gov>, <jhuston@co.gloucester.nj.us>, <jim.lewis@dot.state.nj.us>, <jkeller@pottstown.org>, <jkorus@pa.gov>, <jmosca@pa.gov>, <jneal@chestercity.com>, <john.haak@phila.gov>, <jromano@larsondesigngroup.com>, <jthanson@drpa.org>, <jumorton@ci.camden.nj.us>, <jwilkerson@trentonnj.org>, <kamcfarlane@drpa.org>, <kbecica@camdencounty.com>, <kcastagnola@southjerseyport.com>, <keith.lynch@dot.gov>, <keith.skilton@dot.gov>, <kelmack@verizon.net>, <kskeels@drjtbc.org>, <lshifflet@state.pa.us>, <lbelmonte@pa.gov>, <lloyd@mercercounty.org>, <lguarini@pa.gov>, <liz.feinberg@verizon.net>, <lmillan@njtransit.com>, <louc@camdencounty.com>, <loutan.reema@epa.gov>, <lrichards@septa.org>, <lthompson@njtransit.com>, <lyoung@philaport.com>, <mark.squilla@phila.gov>,

<martine.decamp@phila.gov>, <mcsafe27@yahoo.com>, <medmond@montcopa.org>, <michael.a.carroll@phila.gov>, <michelle.webb@phila.gov>, <mkichline@chesco.org>, <mkolber@trentonnj.org>, <mlawson@mercercounty.org>, <mmoskowitz@chesco.org>, <moltzen.michael@epa.gov>, <monica.etz@dot.state.nj.us>, <mpopek@montcopa.org>, <mremisa@bcbridges.org>, <mshorr@pa.gov>, <nathan.powers@phila.gov>, <nhaynes@philaport.com>, <nicholas.baker@phila.gov>, <nralston@pa.gov>, <patpatters@pa.gov>, <paul.j.lehmann@hud.gov>, <pheck@sjta.com>, <plspinelli@drpa.org>, <prykard@chestercity.com>, <pwillan@klehr.com>, <raygreen@pa.gov>, <raymond.tomczak@dot.gov>, <rgbrahler@buckscounty.org>, <richard.m.ott@hud.gov>, <rkhepkins@drpa.org>, <rlittle@drjtbc.org>, <robert.clark@dot.gov>, <rofogel@pa.gov>, <rsaintilien@trentonnj.org>, <rtroberts@njtransit.com>, <ruth.foster@dep.nj.gov>, <rwonderling@greaterphilachamber.com>, <sakinah.hearn@phila.gov>, <sean.thompson@dca.state.nj.us>, <servidio.cosmo@epa.gov>, <sfrance@montcopa.org>, <shaffert@co.delaware.pa.us>, <sheppard.v.williams@hud.gov>, <sregister@trentonnj.org>, <sschulz@camdencounty.com>, <sshankar@pa.gov>, <stephenmazur@sjta.com>, <sutapa.bandyopadhyay@dot.gov>, <tbianco@co.gloucester.nj.us>, <terry.garcia crews@dot.gov>, <timothy.lidiak@dot.gov>, <tkcook-artis@drpa.org>, <tkirkland@chestercity.com>, <tomcoleman@rclawnj.com>, <tstanuikynas@bcbridges.org>, <tziegler@co.gloucester.nj.us>, <uzoma.anukwe@dot.gov>, <valeriya.remezova@dot.gov>, <varkoosh@montcopa.org>, <vibasara@ci.camden.nj.us>, <vvoltaggio@co.gloucester.nj.us>, <wcschanahan@drpa.org>

Cc: Sue Simon <sue.simon@mail.house.gov>, Kyle Melander <kyle.melander@mail.house.gov>, Santarsiero, Senator Steve <Steve.santarsiero@pasenate.com>, Rose Wuenschel <Rosemary.wuenschel@pasenate.com>, Sticker, Shannon <Shannon.Sticker@pasenate.com>, Fagan, Dan <dan.fagan@pasenate.com>, Rep. Perry Warren <RepWarren@pahouse.net>, ryan bevitiz <rbevitiz@pahouse.net>, <CommEllisMarseglia@buckscounty.org>, <CommDiGirolamo@buckscounty.org>, Fredric K Weiss <fweiss@lmt.org>, Daniel R. Grenier <dgrenier@lmt.org>, John Lewis <jlewis@lmt.org>, Suzanne Blundi <sblundi@lmt.org>, James McCartney <jmccartney@lmt.org>, David J. Truelove <dtruelove@hillwallack.com>, David Bria <dbria@yardleyboro.com>, Kurt M. Ferguson <kurtf@lmt.org>, Trenton Threatened Skies <trentonthreatenedskies@gmail.com>, <Brram.org@gmail.com>, <bseymour@dvrpc.org>, <jward@dvrpc.org>, <pelkis@dvrpc.org>, <grants@williampennfoundation.org>, <Joanne@buxmontwater.org>, <Hope@buxmontwater.org>, <info@thewatershed.org>, susan herman <rtsbuckspsa5@gmail.com>

Dear DVRPC Board Members,

As you know, we are worried about the continued reckless, unchecked expansion of Trenton-Mercer Airport (TTN). It will not only likely cause irreparable harm to the residents, businesses & communities of Mercer County (NJ) and Bucks County (PA), but the likely poisoning of the Delaware River will cause irreparable harm to the millions of people who get their drinking water from the Delaware. (The hardest hit have been, and will continue to be, the vulnerable NJ communities of Ewing Twp. & the City of Trenton.)

Now TTN is asking the FAA for permission to tax travelers (PFC/PFF) to raise money to build **another** taxiway *connector*. Their ultimate plan, which they are on the way to accomplishing, is dual parallel taxiways.

Dual parallel taxiways allow one-way flow which allows for a dramatic increase in airport operations. They have split taxiway projects into numerous smaller taxiway "repair" projects, so as to avoid doing the appropriate environmental assessment. Repairs are accomplished with a CATEX (categorical exclusion), requiring a much less rigorous assessment.

TTN's continued irresponsible actions are resulting in the demise of our natural resources, healthy communities, quality of life and home values.

WE IMPLORE THE DVRPC BOARD TO READ THE ATTACHED FORMAL WRITTEN COMMENTS (summarized below)

RE: TTN Project Title: Construct Taxiway D2 (Design & Construction)-Impose & Use; PFC Notice of Intent 21-08-C-00 TTN .

The comment period for this project ends *TODAY*, Oct. 5, and comments are to be mailed to TTN's Manager, Ms. Melinda Montgomery. It is inconsiderate & unconscionable that in today's COVID-19 environment, TTN did not provide an email alternative for comment submission.

SUMMARY OF ATTACHED WRITTEN COMMENTS:

-The first two (2) comments are from Trenton Threatened Skies, Inc. (TTS).

These highlight the continued misrepresentation of this project (& other taxiway projects) by the FAA & TTN.

-The 3rd comment is from PA State Senator Steve Santarsiero.

-The 4th comment is from Bucks Residents for Responsible Airport Management (BRRAM)

-The 5th comment is from Residents for Regional Traffic Solutions, Inc. (RTS).

This contains written testimony submitted by many PA politicians, NJ/PA grassroots groups & individuals regarding the:

(a) 7/30/20 NJ Clean Air Council Public Hearing RE: Past, Present, and Future:

Air Quality Around Our Ports and Airports; and

(b) PA DEP 2020 Water Quality Monitoring & Assessment Report

At the 9/24/20 DVRPC Board meeting, RTS IMploRED THE DVRPC BOARD to vigorously and formally require the DVRPC to re-examine its plans to make TTN a "booming airport" and re-prioritize the importance of clean water and clean air to the region as the primary goals.

Today, once again, we implore the DVRPC Board to do this, BEFORE IT IS TOO LATE.

Sincerely,


Susan Herman, President

Residents for Regional Traffic Solutions, Inc.

5 attachments

 **TTS to TTN re PFF 092920.pdf**
3193K

 **TTS Questions re PFF of TTN Montgomery 092920.pdf**
72K

 **Santarsiero letter. Taxiway D2 Project.pdf**
2850K

 **BRRAM response to Additional runway and expansion oct 2020.pdf**
97K

 **TaxiwayD2PrjctCmnt.PDF**
5283K

Alison Hastings <ahastings@dvrpc.org>
To: Barry Seymour <bseymour@dvrpc.org>
Cc: Michael Ruane <mruane@dvrpc.org>

Mon, Oct 5, 2020 at 12:19 PM

I'm working packaging all of these documents in one place for Mike.

Mike - stay tuned. I'll send it to you shortly.

And Mike - just to clarify --- Susan made a comment at the September Board meeting; followed up by emailing the board on 9/24; and this looks like a third comment (but 2nd email).

10/5/2020

Delaware Valley Regional Planning Commission Mail - Fwd: Trenton Airport Expansion likely to poison the Delaware River

Working from Home; available at 856-278-9122

Alison Hastings, PP/AICP | Associate Director, Communications & Engagement

(Pronouns: she/her/hers)

Delaware Valley Regional Planning Commission

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[Quoted text hidden]

1 October 2020

**RE: Public Comments regarding proposed
Passenger Facility Charges (PFC) PFC 21-08-c-00-TTN for Taxiway D2**

Intro: This letter represents the concern of over 900+ members of the Bucks Residents for Responsible Airport Management. (BRRAM). Membership consists of people living in both New Jersey and Pennsylvania. BRRAM has been monitoring and questioning the actions of TTN for over 22 years. We are particularly dismayed by the most recent developments and expenditures being reviewed.

Dear Ms. Montgomery, FAA Administrators & Mercer County Officials

For over 20 years, TTN has been attempting to expand the airport. This most recent effort is skilled, crafty and very concerning. TTN's continued segmentation of expansion projects under the guise of "improvement" is cause of deep concern with regards to the current and prospects of this region. Specifically:

**RE: Below are Public comments regarding proposed Passenger Facility Charges (PFC).
PFC 21-08-C-00-TTN For Taxiway D2:**

*TTN will impose PFCs of > \$1.4 Million to reimburse the cost of building Taxiway D2. The proposed project will provide a standard parallel taxiway for aircraft utilizing Runway 16-34, as well as additional exit locations for aircraft landing on Runway 6-24. PFC anticipated start date of **November 1, 2021, or upon the completion of collections associated with the previous Notice of Intent (19-06- C-00-TTN)**, with an estimated charge expiration date of August 1, 2022, based on current annual enplanement projections.*

These proposed PFCs are **in addition to CURRENT PFCs 19-06-C-00-TTN** of and estimated **\$3.2 Million** slated for collection 12/1/2019 through 11/1/2021.

While we are not opposed to the general concept of PFC to reimburse county bonds, we are:

1. Alarmed at the continued expansion of the airport despite significant community controversy;
2. Dismayed at massive development by segmentation into smaller projects;
3. Opposed to **building full length parallel taxiways that will *dramatically increase airport operations***;
4. Concerned for the environmental & public health implications that will result from expanded operations;
5. Angered regarding the **enormous debt burden** TTN and Mercer County are willing to accept at a **time of *decreased air travel and financial crisis***;
6. Confusion as to why county officials are not using these funds to help Mercer residents in need.

The financial concern is apparent in the qualified start date of collections (“11/2021 or upon completion of prior PFF collections”). FAA online statistics show TTN collected PFC revenues of \$1.9M in 2019 and \$1.8M in 2018, both during pre-COVID peak travel. Current PFC 19-06-C-00-TTN collections are tasked with raising \$3.2 million by this time next year.

Common sense indicates that this is impossible, particularly because collections began in December 2019, only 3 months before the pandemic shut down most air travel. It is reasonable to assume the bulk of PFC 19-06-C-00-TTN principal remains unpaid. Given that air travel remains minimal and that recovery is anticipated to take years, it is irresponsible to continue expansion projects and add to Mercer County’s debt burden.

Undeterred by neither the *growing* dismal predictions for air travel recovery nor the unprecedented deficits in county, state and federal budgets, ***TTN and Mercer county officials seem perfectly willing to continue to incur debt and expand the airport.*** There remains a very real possibility of project incompleteness as both Federal and NJ state budgets amass devastating shortfalls.

Specifically consider the FAA’s Airport Improvement Program (AIP), the source of many TTN grants. The AIP itself is funded by the Airport and Airway Trust Fund (AATF). The **AATF Congressional Report (R44749)** states:

“Poor economic conditions or external events could curb demand for air travel, reducing revenue from the ticket taxes that are the main source of AATF funding.”

In other words, not only could revenues from PFCs decline, but funding from FAA/AIP could disappear as well.

Similarly, New Jersey is in a devastating financial situation, with the Governor borrowing \$4.5 Billion to keep the state operating. It is entirely possible that NJDOT grants, on which TTN depends for many projects, could similarly be decreased.

All of this is in addition to massive Mercer County budgetary shortfalls. Using bonds to finance an airport expansion raises the very real possibility that AIP federal funds, NJDOT funds and TTN revenue (passenger facility & other airport fees) may remain drastically suppressed after we have assumed massive bond debt. This worse case financial scenario is an entirely realistic possibility that would likely devastate county finances for decades to come.

Regarding the project itself, Mercer Officials have disingenuously misrepresented the project. The voice of Mercer & Bucks county residents has been repeatedly suppressed. Noise complaints to the TTN hotline were erased with no record kept, officials have not answered questions and OPRA requests have been delayed or denied. Transparency is lacking. Residents’ concerns are repeatedly dismissed by falsely declaring the airport is “not expanding because the number of runways remains the same”. This is utter nonsense; when air travel

ultimately recovers, through-put can significantly increase on the same two runways. This will certainly happen when TTN and County officials achieve their goals:

1. a 4 to 5-fold larger terminal;
2. dramatically increased screening and holding capacities;
3. an increase from 2 gates, (loosely interpreted as '4 parking positions'), to 4 gates (also with additional parking positions);
4. the change to passenger boarding bridges on all 4 gates;
5. the addition of dual parallel taxiways.

As these PFCs are meant to pay for parallel taxiway development, we should be honest that the goal of such is to increase efficiency and thus through-put or operations.

To achieve this goal, segmentation into more than 25, individual, smaller, projects has occurred without the acknowledgment of the ultimate goal or impact.

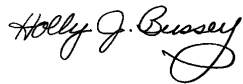
If the result of these smaller runway additions & renovations is dual parallel runways, the ultimate anticipated flight volume should be accurately and honestly assessed. Instead, the CATEX approval for the significant D&G connector uses a maintenance and repair exemption to avoid acknowledging the impact on local ozone, from which we suffer non-attainment status.

The CATEX for Taxiway D2, as related to proposed PFCs, is not available online, but presumably it also minimizes the full cumulative impact of these construction projects.

This is not a new tactic for TTN, but the number and depth of these projects is a growing concern. Indeed in the late 1990's the whole question of the history of the growth (expansion) of TTN without proper adherence to NEPA guidelines cause BRRAM to file a lawsuit questioning the finding of NEPA and why TTN was exempt from performing a comprehensive environmental study examining the *cumulative impact* of the years of incremental improvements which really constituted expansion.

In closing, we reiterate our strong opposition to continued expenditures on airport expansion. Our position remains that the airport is a poor investment, both financially risky currently, and environmentally dangerous in the long-term.

Sincerely,



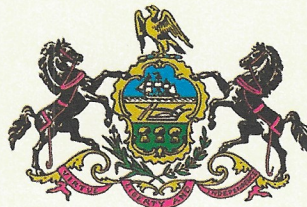
Holly J Bussey, President

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STEVE SANTARSIERO
10TH SENATORIAL DISTRICT

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E-MAIL: SenatorSantarsiero@pasenate.com
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WEB: www.SenatorSteveSantarsiero.com

Senate of Pennsylvania

October 2, 2020

Ms. Melinda Montgomery, Airport Manager
Trenton Mercer Airport
340 Scotch Road, Suite 200
Ewing, NJ 08628-2411

RE: TTN Project Title: Construct Taxiway D2 (Design & Construction)-Impose & Use;
PFC Notice of Intent 21-08-C-00 TTN

Dear Ms. Montgomery,

I am concerned about the planned expansion of the Trenton-Mercer Airport (TTN) and the impact that it will have on the health and well-being of surrounding area residents.

Over the past twenty years, the Trenton-Mercer Airport (TTN) has succeeded in its desired expansion efforts through various segmented projects and to date, it continues to pursue large scale expansion under those same segmented methods. Regrettably, in doing so, the Trenton-Mercer Airport (TTN) has been able to bypass having to complete a cumulative and expansive Environmental Impact Study (EIS) that would have likely measured the impacts on all affected Mercer County (NJ) and Bucks County (PA) municipalities.

Now the Trenton-Mercer Airport (TTN) has proposed Passenger Facility Charges (PFC) in excess of \$1.4million to reimburse the cost of building Taxiway D2. The PFC is not in itself a concern, however increasing funding for this taxiway does demonstrate the intent to dramatically increase airport operations. I continue to have concerns regarding expansion to the Trenton Mercer Airport (TTN) and its impact to the residents of Bucks County.

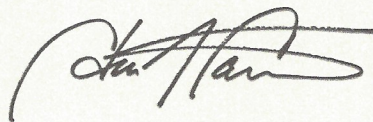
Our concerns include, but are not limited to:

- Release of contaminants to surrounding tributaries and the Delaware River, which is a primary source of residential drinking water for millions of people;
- Increased aviation emissions and noise, which can cause heart attacks, asthma, pregnancy complications, learning, behavioral and psychiatric issues; and,
- Overall decreased quality of life and home values for nearby residents.

The Trenton-Mercer Airport (TTN) is currently pursuing a large number of projects individually, yet their cumulative impact should be considered rather than independent of one another. To date, there are roughly twenty-five projects that have either been approved, are in the process of seeking approval, or are planned in the near future. Without a cumulative Environmental Impact Study (EIS), it is entirely unclear how said projects may impact the local environment.

I request that all proposed expansion or renovation projects at the Trenton Mercer Airport (TTN) first undergo an extensive Environmental Impact Study (EIS) to determine the cumulative impact on noise, pollution, and safety to ensure the health and well-being of the area's surrounding residents.

Very truly yours,



Steven J. Santarsiero
10th Senatorial District

CC: FAA Administrators
Mercer County Officials
Trenton Threatened Skies, Inc

R.R.T.S.
Residents for Regional Traffic Solutions, Inc.
P.O. Box 285
Newtown, PA 18940
RRTSbucks5@gmail.com

Memorandum

CONTENTS: 6 -page Cover Letter

1 -page Table of Contents for Exhibits, 61 pages of Exhibits

1 VIDEO: **Trenton Airport Expansion: Your Neighbors' Concerns** (use link below)

<https://www.youtube.com/watch?v=ZHU7m1Rzvyw&feature=youtu.be>

To: Ms. Melinda Montgomery (Trenton-Mercer Airport Manager), U.S. Senator Menendez (NJ), U.S. Senator Booker (NJ), U.S. Senator Bob Casey (PA), U.S. Senator Pat Toomey (PA), Congresswoman Bonnie Watson-Coleman (NJ), Congressman Tom Malinowski (NJ), Congressman Chris Smith (NJ), Congressman Fitzpatrick (PA), Governor Phil Murphy (NJ), Governor Tom Wolf (PA), Ms. Catherine McCabe (Commissioner, NJ Dept. of Environmental Protection), Ms. Diane Gutierrez-Scaccetti (Commissioner, NJ Dept. of Transportation), Mr. Patrick McDonnell (Secretary, PA Dept. of Environmental Protection), Ms. Yassmin Gramian (Secretary, PA Dept. of Transportation), and Mr. Barry Seymour (Executive Director, Delaware Valley Regional Planning Commission)

VIA EMAIL AND FEDEX, SIGNATURE REQUIRED/ CERTIFIED MAIL, RETURN RECEIPT

Date: September 25, 2020

RE: WRITTEN COMMENT SUBMISSION FOR

TTN Project Title: Construct Taxiway D2 (Design & Construction)- Impose & Use;
PFC Notice of Intent 21-08-C-00 TTN

SUMMARY

Residents for Regional Traffic Solutions, Inc. (RRTS) vigorously and formally opposes ALL current and proposed expansion or renovation projects at Trenton-Mercer Airport (TTN), including:

- **TTN Project Title: Construct Taxiway D2 (Design & Construction) - Impose & Use;**
PFC Notice of Intent 21-08-C-00 TTN ("Taxiway D2 Project"), and
- the **Master Plan of 2018** that calls for:
 - i) building a Passenger Terminal that is five (5) times the size of the current terminal, and
 - ii) the **Runway Protection Zone & Obstruction Mitigation Project**, and
 - iii) twenty-five (25) individually- considered, segmented-out projects.

1. Our concerns are not only based on grave environmental and safety issues, but also the need to address the irresponsible action by the Mercer County Board of Freeholders in obtaining \$177 million Bond issue to pay for this inappropriate and unnecessary expansion. The Board of Freeholders are relying on a repayment of the Bond from the collection of revenue raised from airport fees by increased traffic. This calculation is blatantly inconsistent with their statements made at public meetings that there was a minimal expansion of the airport, only involving the terminal and some supporting runways.
2. We expect that TTN will disingenuously market the **Taxiway D2 Project** as routine taxiway maintenance, even though the goal is to redesign the taxiways to improve efficiency of airport operations. This is the reason why the airport authority is spending such a large amount of money on the taxiway improvements. Without these improvements, should airport traffic increase significantly, the airport would have a lot of traffic jams on the taxiways. (Conversely, if no increase in traffic is anticipated, the airport would not need to redesign the taxiways and would not need to spend that kind of money.)

The **Taxiway D2 Project** will result in construction of full-length parallel taxiways that will enable there to be fewer turns and one-way traffic and allow for a dramatic increase in airport operations. TTN has been in the process of "rehabbing", relocating and then connecting various taxiways, with the end-result of creating full length taxiways parallel to each runway.

3. The bottom line is that construction of the **Taxiway D2 Project**, along with the other twenty-five (25) individually-considered, segmented-out projects in the **Master Plan of 2018**, will lead to TTN becoming the eastern HUB described in the DVRPC's (Delaware Valley Regional Planning Commission's) July 2014 publication titled 2040 Regional Airport System Plan (RASP). This Plan calls for expanding TTN far beyond an appropriate-sized local airport. Consider that on page 32 of the 2040 RASP it states, "The airport [TTN] is marketing itself as an alternative to Philadelphia International Airport and Newark's Liberty International Airport, offering less hassle".

The DVRPC's website states,

"DVRPC's vision for the Greater Philadelphia Region is a prosperous, innovative, equitable, resilient, and sustainable region...that protects and preserves our natural resources while creating healthy communities..."

The DVRPC has lost its way regarding its expansion plans for TTN, as outlined in the video titled Trenton Airport Expansion: Your Neighbors' Concerns. (Use below link to view video)

<https://www.youtube.com/watch?v=ZHU7m1Rzvyw&feature=youtu.be>

The current & proposed expansion plans for TTN, including the **Taxiway D2 Project**, are resulting in the demise of: our natural resources, healthy communities, quality of life and home values. THIS IS IN CONFLICT WITH THE DVRPC'S STATED GOALS.

4. BEFORE IT IS TOO LATE, we implore Ms. Montgomery, the Mercer County Freeholders, New Jersey & Pennsylvania politicians up the line through the Federal level, and DVRPC Executive Director Barry Seymour to reexamine the plans to make TTN a "booming airport" and *reprioritize the importance of clean water and clean air to the region as primary goals.**

5. We want to reiterate that TTN's continued reckless, unchecked large-scale expansion under the radar (as it has gotten away with doing during the last 25 years) has grave environmental and fiscal consequences. It will not only likely cause irreparable harm to the residents, businesses and communities of Mercer County (NJ) but will also likely cause irreparable harm to the residents, businesses and communities of Bucks County (PA) and millions of people who get their residential drinking water from the Delaware River. The hardest hit will be the vulnerable New Jersey communities of Ewing Township and the City of Trenton.

BACKGROUND

6. In PA Congressman Brian Fitzpatrick's August 2020 Written Testimony submitted for the **7/30/20 New Jersey Clean Air Council Public Hearing RE: Past, Present, and Future: Air Quality Around Our Ports and Airports**, he states, "...TTN implemented a comprehensive Master Plan that calls for large-scale enhancements to the terminal, taxiway, and runway to increase passenger traffic at TTN. Unfortunately, TTN has chosen to segment these projects in an effort to reduce the level of NEPA analysis required from an Environmental Impact Statement (EIS) that would require a broader scale cumulative impact analysis that would take into consideration the impacts to my constituents in Pennsylvania. The planned airport expansion has the potential to negatively impact the residents, businesses, and community that comprise PA-01, as a flight path associated with the airport is directly above the district. Adding to the already poor air quality of the Philadelphia Metropolitan area, the first phase of the proposed plan will result in the clearing of 2.3 acres of trees within 100 feet of contaminated groundwater associated with the Naval Air Warfare Center..."

In the August 2020 Written Testimony submitted for the **7/30/20 New Jersey Clean Air Council Public Hearing RE: Past, Present, and Future: Air Quality Around Our Ports and Airports** by the grass roots group Trenton Threatened Skies**, it states, "...Emerging health data links aviation emissions and noise to heart attacks, asthma, pregnancy complications, learning, behavioral and psychiatric issues. Our home values can be expected to decrease up to 30% with increased commercial flight volume and our air and water quality will certainly deteriorate...Heavy metals and jet soot exhaust will put our local food at risk for contamination. Toxic emissions from planes flying below 900 feet are endangering visitors and wildlife at Mercer Meadows and Rosedale Park. Unregulated airplane exhaust impacts on our air quality have been seriously underestimated and the citizens of Mercer County implore the New Jersey Clean Air Council to vigorously oppose the expansion plans of the Trenton-Mercer Airport."

*See page 43 of DVRPC's publication titled [resilience] 2014 WEEKLY PLANNER/FY2013 ANNUAL

**Trenton Threatened Skies, Inc. is a non-profit 501(c)3, led by a group of concerned Mercer Co. residents. Its mission is to gather, review, analyze, and disseminate information regarding the Trenton-Mercer Airport, in Ewing, NJ, with respect to the environmental, public health, safety, and economic impacts of the proposed & future operations of the airport.

7. Residents in both Mercer County (NJ) and Bucks County (PA) share the concerns expressed by Congressman Fitzpatrick and Trenton Threatened Skies (a.k.a. TTS). We are worried about the release of poisonous contaminants into surrounding tributaries and the Delaware River, including PFOS, VOC's and mercury known to be present at the Naval Air Warfare Center. The Delaware River is a primary source of residential drinking water for millions of people. *We know from the July 2020 launch of the **PA PFAS Multi-Site Study** (a national study where the CDC has selected Pennsylvania & New Jersey among seven sites/states to participate. See 7/13/20 Philadelphia Inquirer article titled "PFAS testing planned for 2 counties" on page 8/68), that PFAS contamination of drinking water is linked to harming children's neurological development, kidney cancer and testicular cancer and studies suggest that exposure to high levels of PFAS can have a detrimental effect on the body's immune system.* Consider that U.S. Senators Bob Menendez (NJ) and Bob Casey (PA) are part of a group of nineteen (19) Senators asking the U.S. Department of Health whether the potential connection between PFAS exposure and COVID-19 is being thoroughly examined.

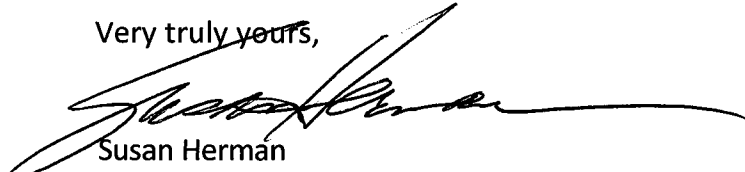
8. In RRTS's Public Comment made at the 9/10/20 Formal Meeting of the Mercer County Freeholders, we implored the Freeholders to read several Written Testimonies & Written Comments [that were formally submitted in August, 2020 to the NJ Clean Air Council & the Pennsylvania Department of Environmental Protection (PA DEP)] *BEFORE* approving several airport-related RESOLUTIONS that were on the agenda. These well-informed testimonies/comments elaborate upon the grave environmental & fiscal consequences of TTN's past & proposed unchecked expansion. We attached the following Testimonies/Comments to RRTS's 9/10/20 Public Comment that was emailed to the entire Freeholder Board immediately after we made public comment:

- A. See pages 9/68 - 52/68 Written Testimonies for the **7/30/20 New Jersey Clean Air Council Public Hearing RE: Past, Present, and Future: Air Quality Around Our Ports and Airports** that were submitted by:
- i. *Pennsylvania politicians: Congressman Brian Fitzpatrick, State Senator Steve Santarsiero, State Representative Perry Warren & the Lower Makefield Township Board of Supervisors;*
 - ii. *Grassroots organizations: Trenton Threatened Skies, BRRAM (Bucks Residents for Responsible Airport Management), RRTS; and*
 - iii. *Mercer County medical doctor & concerned resident, Dr. Debra Baseman; AND*
- B. See pages 53/68 - 68/68 Written Comments for the **PA DEP 2020 Water Quality Monitoring & Assessment Report** that were submitted by: *Lower Makefield Township Board of Supervisors, BRRAM and RRTS.*

We have included the aforementioned formal Written Testimonies and Written Comments in this Written Comment Submission and implore Ms. Montgomery, the Mercer County Freeholders, New Jersey & Pennsylvania politicians up the line through the Federal level, NJ & PA Departments of Environmental Protection, NJ & PA Departments of

Transportation and DVRPC Executive Director Barry Seymour to take the time to read them, BEFORE IT IS TOO LATE.

Very truly yours,



Susan Herman
President, RRTS*

**Residents for Regional Traffic Solutions, Inc. (RRTS) is a non-profit organization founded in August, 2001. Its purpose is to engage in public awareness as to traffic issues in the Central Bucks County area. RRTS focuses on issues related to transportation, infrastructure and the impact of transportation-related decisions on regional populations. In the case of Trenton-Mercer Airport, the impacted regional populations are in Mercer County, NJ & Bucks County, PA.*

CC: All individuals/groups will receive this via email. Those asterisked will also receive it via Certified Mail, Return Receipt.

FEDERAL LEVEL:

Congressional Quiet Skies Caucus

STATE LEVEL:

PA Attorney General Josh Shapiro*
Senator Steve Santarsiero (PA)*
State Representative Perry Warren (PA)*
Senator Shirley Turner (D15-NJ)*
Senator Linda Greenstein (D14-NJ)*
Senator Christopher Batemen (D16-NJ)*

COUNTY LEVEL:

Mercer County Executive Brian Hughes*
Mercer Co. Freeholders (NJ): Cimino*, Koontz (chair)*, Cannon*, Walter*, Frisby*, Colavita*, Melker*
Bucks County Commissioners (PA): Ellis- Marseglia (c hair)*, Harvie* DiGirolamo*

MUNICIPAL LEVEL:

Members of Councils/ Committees in Mercer County (NJ):

East Windsor Twp.: c/o president (pres.)*
Ewing Twp.: c/o president *
Hamilton Twp.: c/o pres.*
Borough of Hightstown: c/o pres. *
Hopewell Borough: c/o pres. *
Hopewell Twp.: c/o pres.*
Lawrence Twp.: c/o pres. *
Borough of Pennington: c/o pres. *
Princeton: c/o pres. *
Robbinsville Twp.: c/o pres. *
City of Trenton: c/o pres. *
West Windsor Twp.: c/o pres. *

Members of Councils/ Boards of Supervisors (PA):

Langhorne Borough Council: c/o pres. *
Lower Makefield Twp. Board of Supervisors (BOS): Grenier*, Weiss (chair)*, Lewis*, Blundi*, McCartney*
Middletown Twp. BOS: c/o chair *
Morrisville Borough Council: c/o pres. *

Newtown Borough Council: c/o pres.*
Newtown Twp. BOS: Calabro (chair)*, Oxley, Mack, Davis, Fisher
Upper Makefield Twp. BOS: c/o chair *
Yardley Borough Council: c/o Bria (pres.)*
Falls Twp. BOS: c/o chair*

Sue Simon
Kyle Melander
Rose Wuenschel

Shannon Sticker
Dan Fagan
Ryan Bevitz

Ruth Foster (Director; NJ DEP, Office of Permit Coordination & Environmental Review)*

DVRPC Board members

John Ward, DVRPC Deputy Executive Director*

Patty Elkins, DVRPC Director of Planning*

Evan Stone; Executive Director, Bucks County Planning Commission*

Lower Makefield Township (LMT) Manager, Kurt Ferguson *

LMT Solicitor, David Truelove*

LMT Trenton-Mercer Airport Review Panel

Bucks Residents for Responsible Airport Management (c/o President, Holly Bussey)

Trenton Threatened Skies

Mercer Quiet Skies

Residents for Regional Traffic Solutions, Inc.

William Penn Foundation *

Water Resources Association of the Delaware River Basin *

Partnership for the Delaware Estuary *

Buxmont Coalition for Safer Water *

Delaware River Keepers

Delaware/Raritan Canal Commission

Pennsylvania Canal Society

Canal Society of New Jersey

NJ Sierra Club

PA Sierra Club

Clean Air Council (Philadelphia, PA)

NJ Audubon Society

Bucks County Audubon Society

Watershed Institute *

TABLE OF CONTENTS FOR EXHIBITS

Page 8/68 : 7/13/20 Philadelphia Inquirer article titled:
"PFAS testing planned for 2 counties"

Pages 9/68 - 52/68 : Written Testimonies For the:
"7/30/20 New Jersey Clean Air Council PUBLIC HEARING
RE: Past, Present & Future: Air Quality Around Our
Ports and Airports"

Pages 53/68 - 68/68 : Written Comments for the:
"Pennsylvania Department of Environmental
Protection 2020 Water Quality Monitoring
and Assessment Report"



Cars drive through rain puddles along the White Horse Pike in Lindenwold as Tropical Storm Fay passes through on Friday.

Page 8 of 68

PFAS testing planned for 2 counties

Adults and children from Bucks and Montco are being sought for a national study on the chemicals.

By Frank Kummer
STAFF WRITER

Starting this fall, Pennsylvania and federal health officials hope to recruit 1,000 adults and 300 children in Bucks and Montgomery Counties for a national study on the impacts of PFAS chemicals on thyroids, cholesterol levels, kidneys, immune systems, livers, and even behavioral problems.

It's another chance for residents of Horsham, Warminster, and Warrington Townships whose drinking water was contaminated by nearby military bases to get their blood tested.

As in a 2018 pilot test that preceded the national project, the testing won't look for links to cancer, and at least to start, will not be focused on people who once worked at the Naval Air Warfare Center Warminster and Naval Air Station Willow Grove, where the "forever chemicals" leached off the bases from fire-fighting foam.

Rather, the study will seek volunteers from among the residents of the same communities, which are adjacent to the bases.

PFAS — per- and polyfluoroalkyl substances — are a class of man-made chemical compounds used in producing products such as nonstick cookware coatings, fire retardant furniture, and foam used in firefighting. PFOA, once used to make Teflon, and PFOS, once used in Scotchgard, are among the most widely known, yet there are hundreds more still being used in manufacturing.

Though the full health effects of PFAS are still being studied, known impact includes increased cancer risk, hormonal

interference, infertility, increased cholesterol, and issues surrounding growth, learning, and behavior of infants and children, according to the Pennsylvania Department of Health.

Officials held a two-hour Zoom meeting Thursday night with residents about the upcoming PFAS National Multi-Site Health Studies being conducted by the U.S. Centers for Disease Control and Prevention (CDC) and Agency for Toxic Substances and Disease Registry (ATSDR) on effects of PFAS exposure. The study includes participants from six states, including Pennsylvania and New Jersey.

The national study presents the opportunity for more Horsham, Warrington, and Warminster residents to get their blood tested, after many had already taken part in an earlier pilot study. That 2018 study showed residents tested had elevated levels of PFAS in their blood compared with average Americans.

New results from that pilot study released in a Department of Health report ahead of Thursday's meeting indicated follow-up tests in 2019 didn't reveal significant links between levels of PFAS in dust or water in 14 homes, and levels of PFAS in the blood of the homes' occupants.

The exception was for PFNA, one type of the compound: There was a link between PFNA in one home's tap water with a resident's blood level.

Representatives of the Pennsylvania Department of Health, ATSDR, Buxmont Coalition, Temple, and Brown Universities, and the nonprofit research

group RTI International outlined the parameters of the blood and urine tests set to begin for the national study later this year.

"You're a really highly engaged community," Sharon Watkins, chief epidemiologist for the DOH, said Thursday on Zoom, explaining why the area was chosen to participate. She cited the history and level of exposure as a primary reason.

Residents posted a range of questions, such as who will be allowed to participate, whether PFAS is linked to higher risks with COVID-19 (not immediately, they were told), and which communities would be included in the study.

The testing would include:

- ▶ Households in areas closest to the military bases subjected to greater concentrations of PFAS over longer periods of time.

- ▶ Adults 18 and older and children 4-17.

- ▶ About 235 residents who already participated in a pilot study that looked at the compounds in blood and urine, as well as dust and drinking water in homes.

It would exclude:

- ▶ People who haven't been exposed to PFAS for 15 years or longer.

- ▶ People exposed to the chemicals through work.

- ▶ Prisoners or those under house arrest.

Officials hope this fall to recruit volunteers for blood and urine testing. A full public analysis won't be complete until spring 2024, though participants will get their own results much earlier.

A headquarters will be set up in the area for the yearlong program, staffed with an office manager, field interviewers, clin-

ical interviewers, phlebotomists, a nursing assistant, and laboratory technician.

Adult volunteers will be paid \$50 per blood or urine test, and children will be paid \$75. Children under 5 will complete behavioral tests up to 90 minutes long that will include memory games, item sorting, puzzles, and reactions to photos.

A website, papfas.rti.org, which is not yet active, will provide further information.

Answering a question from an anonymous military veteran and area resident, Ted Lillys, an environmental engineer with RTI, said there was no plan to look specifically at base workers, but testing could be expanded in the future.

Area resident William Gildea-Walker asked if there would be any additional funding to study links between cancer and PFAS.

Reza Jones, chair of Temple's epidemiology and biostatistics department, said the group might look at the possibility in the future.

The ATSDR and Pennsylvania DOH looked at cancer cases in the area from 1985 through 2013 but did not find clusters that might be expected with an environmental cause.

Correne Kristiansen, chief of staff for State Sen. Maria Collett, who represents parts of Montgomery and Bucks Counties, asked if the group will look at potential links between PFAS levels and severity of COVID-19.

Officials said that is not included in the initial study parameters, but might be added.

kkummer@phillyinquirer.com

215-854-2329

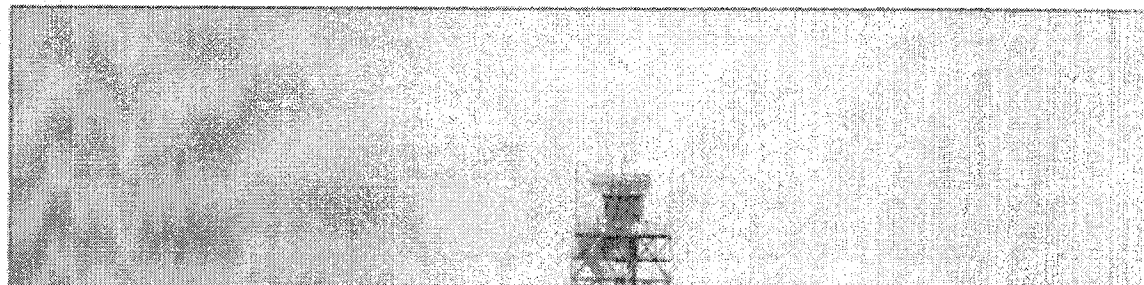
FrankKummer

Staff writer Justine McDaniel contributed to this article.

Atlantic City man slain in Egg Harbor

By Rita Giordano
STAFF WRITER

A 29-year-old Atlantic City man was found shot to death on an Egg Harbor Township street Satur-



BRIAN K. FITZPATRICK
1st DISTRICT, PENNSYLVANIA
COMMITTEE ON FOREIGN AFFAIRS
COMMISSION ON SECURITY AND
COOPERATION IN EUROPE
COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE



Congress of the United States
House of Representatives
Washington, DC 20515

August 13, 2020

Chairman John Valeri, Jr., Esq.
New Jersey Clean Air Council
401 E State Street
Trenton, NJ 08608

RE: Public Comment Regarding Air Quality Around Our Ports and Airports

Dear Chairman Valeri,

I am writing today to add to the public comments for the New Jersey Clean Air Council public hearing regarding air quality around our ports and airports. As a member of the Aviation Subcommittee of the Transportation & Infrastructure Committee and the Quiet Skies Caucus in Congress, I understand the impacts airports have on a neighboring community. I have been heavily involved in the proposed plan to modify the existing Trenton-Mercer Airport (TTN) and continue to be concerned with many of the environmental assessments that have gone into the proposed plan. I am requesting that the New Jersey Clean Air Council review their assessments on environmental impacts on all past, present and future airport plans and ensure that these evaluations receive the highest standard of review.

As you are aware, TTN has proposed and implemented several projects over the past 25 years with little input from the surrounding community as required by the National Environmental Policy Act of 1969 (NEPA) and the Federal Aviation Administration (FAA) Order 1050.1F - Environmental Impacts: Policies and Procedures. TTN implemented a comprehensive Master Plan that calls for large-scale enhancements to the terminal, taxiway, and runway to increase passenger traffic at TTN. Unfortunately, TTN has chosen to segment these projects in an effort to reduce the level of NEPA analysis required from an Environmental Impact Statement (EIS) that would require a broader scale cumulative impact analysis that would take into consideration the impacts to my constituents in Pennsylvania.

The planned airport expansion has the potential to negatively impact the residents, businesses, and community that comprise PA-01 as a flight path associated with the airport is directly above the district. Adding to the already poor air quality of the Philadelphia Metropolitan area, the first phase of the proposed plan will result in the clearing of 2.3 acres of trees within 100 feet of contaminated groundwater associated with the Naval Air Warfare Center (NAWC). In a response letter I received on May 11, 2020, the Federal Aviation Administration (FAA) acknowledged the NJDEP is actively working to remediate NAWC while stating the removal of trees will not significantly impact the groundwater quality in that impacted area.

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Additionally, the standard of studying noise pollution is not consistent amongst airports. The amount of noise studies and impacts of noise pollution of airports are very different when comparing Newark Liberty International and the TTN. Larger airports are constantly testing noise impacts whereas smaller scale airports conduct sparse noise studies.

Going forward, I request New Jersey Clean Air Council review their assessments on environmental impacts and consider expanding its testing protocol on all existing and future evaluations.

If my office can be of any further assistance, please contact me at 215-514-0579.

Thank you,

A handwritten signature in black ink that reads "Brian Fitzpatrick". The signature is written in a cursive style with a large, stylized "B" and "F".

Brian Fitzpatrick
Member of Congress (PA-01)

STATE SENATOR
STEVE SANTARSIERO
10TH SENATORIAL DISTRICT

SENATE BOX 203010
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HARRISBURG, PA 17120-3010
717-787-7305
FAX: 717-783-5962

3 TERRY DRIVE, SUITE 201
NEWTOWN, PA 18940
215-487-8490

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BUILDING 100, SUITE 121
DOYLESTOWN, PA 18901
215-489-5000



Senate of Pennsylvania

COMMITTEES

ENVIRONMENTAL RESOURCES
& ENERGY,
DEMOCRATIC CHAIR
APPROPRIATIONS
COMMUNICATIONS & TECHNOLOGY
CONSUMER PROTECTION
& PROFESSIONAL LICENSURE
JUDICIARY
LOCAL GOVERNMENT

E-MAIL: SenatorSantarsiero@pasenate.com
FACEBOOK: Sen. Steve Santarsiero
TWITTER: SenSantarsiero
INSTAGRAM: Senator_SteveSantarsiero
WEB: www.SenatorSteveSantarsiero.com

August 14, 2020

New Jersey Clean Air Council
Public Hearing held on July 30, 2020
Oral Testimony Submission

RE: Past, Present, and Future: Air Quality Around Our Ports and Airports

Dear New Jersey Clean Air Council,

I am concerned about the planned expansion of the Trenton-Mercer Airport (TTN) and the impact that it will have on the health and well-being of surrounding area residents.

Over the past twenty years, the Trenton-Mercer Airport (TTN) has succeeded in its desired expansion efforts through various segmented projects and to date, it continues to pursue large scale expansion under those same segmented methods. Regrettably, in doing so, the Trenton-Mercer Airport (TTN) has been able to bypass having to complete a cumulative and expansive Environmental Impact Study (EIS) that would have likely measured the impacts on all affected Mercer County (NJ) and Bucks County (PA) municipalities.

All of the segmented and individually considered projects currently being pursued are outlined and appear to be related and interdependent of the Trenton-Mercer Airport's (TTN) Master Plan of 2018. The Mercer County Website describes said Master Plan as such, "the Airport Master Plan is essentially a facility planning study that sets forth a conceptual framework for possible future airport development." The Airport Layout Plan (ALP), which is part of the Master Plan, identifies a proposed terminal expansion, the runway protection zone, and development of Parcel A of the Naval Air Warfare Center where there are known PFOS, VOC'S, mercury, and other contaminants.

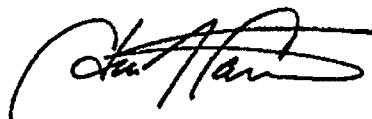
Our concerns include, but are not limited to:

- Release of contaminants to surrounding tributaries and the Delaware River, which is a primary source of residential drinking water for millions of people;
- Increased aviation emissions and noise, which can cause heart attacks, asthma, pregnancy complications, learning, behavioral and psychiatric issues; and,
- Overall decreased quality of life and home values for nearby residents.

The Trenton-Mercer Airport (TTN) is currently pursuing a large number of projects individually, yet their cumulative impact should be considered rather than independent of one another. To date, there are roughly twenty-five projects that have either been approved, are in the process of seeking approval, or are planned in the near future. Without a cumulative Environmental Impact Study (EIS), it is entirely unclear how said projects may impact the local environment.

I request that all proposed expansion or renovation projects at the Trenton Mercer Airport (TTN) first undergo an extensive Environmental Impact Study (EIS) to determine the cumulative impact on noise, pollution, and safety to ensure the health and well-being of the area's surrounding residents.

Very truly yours,



Steven J. Santarsiero
10th Senatorial District

CC: Bucks Residents for Responsible Airport Management (BRRAM)
Residents for Regional Traffic Solutions, Inc. (RRTS)

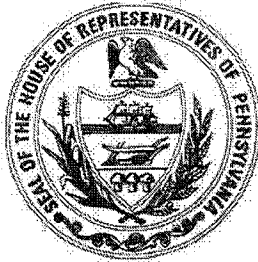
13/68

PERRY WARREN, MEMBER
31ST LEGISLATIVE DISTRICT

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FAX: (215) 493-5424

REPWARREN@PAHOUSE.NET



House of Representatives
COMMONWEALTH OF PENNSYLVANIA
HARRISBURG

Aug. 12, 2020

Ms. Heidi Jones
New Jersey DEP
436 E State St
Trenton, NJ 08608

Re: 2020 New Jersey Clean Air Council Public Hearing – Past, Present and Future: Air Quality Around Our Ports and Airports

Dear Ms. Jones

I represent the 31st Legislative District in Bucks County, Pennsylvania, the communities of Lower Makefield Township, Morrisville, Newtown Borough, Newtown Township and Yardley. Thank you for accepting comments in connection with the 2020 New Jersey Clean Air Council Public Hearing – Past, Present and Future: Air Quality Around Our Ports and Airports. I submit these comments specifically with respect to the Trenton-Mercer Airport.

The Trenton-Mercer Airport is located adjacent to a residential neighborhood, across the Delaware River, two to three miles from the suburban residential communities that I represent. In recent years a growing number of commercial flights have flown daily from and to Trenton-Mercer Airport, following flight patterns above our communities. Notwithstanding the recent increase in flights, the Trenton-Mercer Airport has proposed further expansion.

Many of our residents' air quality is impacted by the operations of the Trenton-Mercer Airport, and the air quality in our communities may be negatively impacted if the airport expands without comprehensive air pollution control measures.

A substantial concern in our communities is that studies and analyses of the environmental and pollution impacts of airport expansion have been "segmented" by virtue of the airport's separate expansion plans. I have received and reviewed letters from the Lower Makefield Township Board of Supervisors, the Residents for Regional Traffic Solutions, Inc., and the Bucks Residents for Responsible Airport Management. Each of these entities raises in their respective letters the issue of the "segmentation" of what appear to be "connected," or at the least "similar," actions, with respect to what amounts to a substantial expansion of the Trenton-Mercer Airport and its operations. The

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cumulative impact of the past and future Trenton-Mercer Airport expansion may adversely affect the air quality of our residents.

The "segmentation" of the proposed expansion is evidenced by the separate public meetings conducted by the Trenton-Mercer Airport. Indeed, the Notice of the Trenton-Mercer Airport's November 27, 2018 "Public Meeting Environmental Assessment for the Runway Protection Zone and Obstruction Mitigation Project for Trenton Mercer Airport" included the parenthetical "*(This is not the Terminal EA or Airport Master Plan Project.)*" The assessment of the air quality currently emitted by the airport and its future construction projects should not be conducted in a vacuum. Rather, the assessment ought to be of all of the proposed expansion project(s) without segmentation. Our residents are affected by the entirety of the past, present and proposed future expansion of the airport and its operations and by the off-airport projects.

Accordingly, I join the Lower Makefield Township Board of Supervisors and the stakeholder organizations and other members of our community in requesting a more holistic evaluation, such as an Environmental Impact Statement, with respect to the totality of the past, present and future expansion of the airport and the airport's operations and of the off-airport projects. Only through such a holistic lens and examination can the actual cumulative impact of the Trenton-Mercer Airport upon our community and its residents be accurately assessed and any negative impact mitigated or eliminated.

Thank you for your consideration of these comments and the best interest of our community and the health, safety and welfare of our residents.

Sincerely,



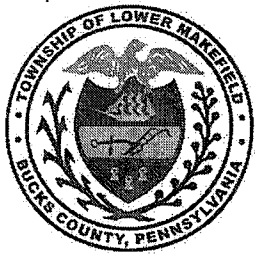
State Representative, 31st Legislative District

District Office: 91 South Main Street, Yardley, PA 19067 | (215) 493-5420

Capitol Office: 27B East Wing, Harrisburg PA 17120-0031 | (717) 787-5475

www.pahouse.com/warren





Township of Lower Makefield

15/68

BOARD OF SUPERVISORS
Fredric K Weiss, Chair
Daniel R. Grenier, Vice Chair
James McCartney, Secretary
Suzanne S. Blundi, Treasurer
John B. Lewis, Supervisor

August 14, 2020

emailed to Heidi.Jones@dep.nj.gov

State of New Jersey
Clean Air Council
401 E State Street, 2nd Floor
PO Box 420
Trenton NJ 08625-0420

To the NJ Clean Air Council

The Pennsylvania Lower Makefield Township (LMT) Board of Supervisors would like to bring to the attention of the New Jersey Clean Air Council our community's air and water pollution concerns regarding \$177M of planned development projects at the Trenton-Mercer Airport in New Jersey. The projects are aimed at significantly expanding air traffic capacity and the airport is ignoring critical NEPA guidelines regarding the environmental impact of these changes as outlined in the LMT letter attached below.

The Trenton-Mercer Airport Master Plan has projected a low rate of air traffic growth of 1% over the period of 2015-2035. But their 2018 and 2019 flight operations already exceed the 2035 projection and the projects have not yet been carried out. Their plans are to increase the terminal by a factor of five while adding taxi ways and other infrastructure projects that will support significantly higher numbers of air operations. To base their environmental impact on an unrealistically low growth rate means the environmental assessments are disingenuous and not reflective of the air and water pollution levels the local NJ and PA communities will experience. Our concerns about these issues has led our Congressman Brian Fitzpatrick to write to the FAA objecting to the procedures being followed by the airport. This letter emphasizing water pollution concerns is also attached below. One of the key problems is that the FAA and airport authorities assert that all of these projects are disconnected and they do not recognize the cumulative impact that these projects will have on the local community and environment in terms of air, water and noise pollution.

We request that the NJ CAC address these concerns to protect the health and quality of life of our collective citizens and our shared environment from a pollution

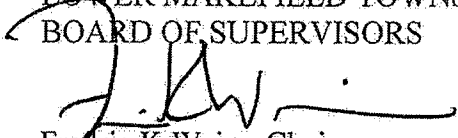
16/68

level that will be significantly higher than has been analyzed if these projects go through. We request that you push the NJ DEP to prepare a full environmental impact statement for the collection of planned projects.

We would be happy to answer questions you may have and support discussions with the council regarding these issues.

Very truly yours,

LOWER MAKEFIELD TOWNSHIP
BOARD OF SUPERVISORS


Fredric K Weiss, Chair

Attachments

LMT letter to TTN/Urban Engineers dated November 9, 2018

Congressman Fitzpatrick letter to FAA dated May 9, 2019

Congressman Fitzpatrick letter to FAA dated November 12, 2019

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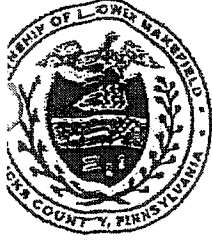


Exhibit II
(page 1 of 5) 11/16/18

Township of Lower Makefield

BOARD OF SUPERVISORS
John B. Lewis, Chairman
Fredric K Weiss, Vice Chairman
Kristin Tyler, Secretary
Daniel R. Grenier, Treasurer
Suzanne S. Blundt, Supervisor

November 9, 2018

TTN Terminal EA
c/o Urban Engineers, Inc.
530 Walnut St., 7th Floor
Philadelphia, PA 19106

Attn: Environmental Assessment

To Whom It May Concern:

The Lower Makefield Township (Township) Board of Supervisors (Board) is providing this letter as formal comments to the Federal Aviation Administration (FAA) and Mercer County with respect to the National Environmental Policy Act (NEPA) and its application to the ongoing Trenton-Mercer Airport Expansion Project (Project).

The proposed Project has the potential to negatively impact the residents, businesses, and community that comprise the Township as the flight path associated with the airport is directly above the Township. Any project that has the potential to negatively impact the Township is of great concern to the Board. It is our responsibility as the Board to advocate for the health, safety, and welfare of our citizens. As such, the Board has major concerns with the process followed for the Project and the potential impacts to our community.

These concerns were addressed in a meeting at Congressman Brian Fitzpatrick's office (PA-08) on June 18, 2018. Meeting attendees included representatives from the following groups:

- FAA,
- Congressman Fitzpatrick's office,
- Lower Makefield Township,
- Upper Makefield Township,
- Yardley Borough,
- Bucks Residents for Responsible Airport Management (BRRAM), and
- Residents for Regional Traffic Solutions, Inc. (RRTS).

Unfortunately, no representatives from the Project attended the meeting. The following Project proponents were invited to the meeting but did not attend:

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- Trenton-Mercer Airport Manager Melinda Montgomery,
- Assistant Trenton-Mercer Airport Manager Dale Carman, and
- Mercer County Executive Brian Hughes.

Trenton-Mercer Airport Deputy Administrator Aaron Watson was also invited to attend but did not respond to the meeting invitation.

Please also note that the Township is aware of letters sent by local citizen stakeholders via certified mail to the Trenton-Mercer Airport management team that have been returned to sender without any acknowledgment of the contents of said letters. This is especially disconcerting as it shows a lack of willingness to discuss Project impacts with those stakeholders most affected by the Project and other activities at the Trenton-Mercer Airport.

The Board feels that an Environmental Assessment (EA) may not fulfill NEPA requirements for the proposed action. FAA's Order Withdrawing a FONSI/ROD dated February 23, 2006 includes the following footnote #3:

The analyses of Build Alternative 2 revealed that that alternative would likely cause sufficient noise impacts that would require the preparation of an Environmental Impact Statement (EIS).

The aforementioned footnote, along with specific language in FAA Orders 1050.1f and 5050.4B, calls into question whether or not an EA is the applicable level of review required for the proposed action. The approach that the Project is taking calls into question whether or not limiting the Project to an EA is the result of segmenting the Project from other connected actions previously completed at the airport and those actions planned for the future.

Per FAA Order 1050.1f, connected actions are discussed as follows:

Connected actions are closely related actions that: (a) automatically trigger other actions; (b) cannot or will not proceed unless other actions are taken previously or simultaneously; or (c) are interdependent parts of a larger action and depend on the larger action for their justification (see 40 CFR § 1508.25(a)(1), CEQ Regulations). Connected actions and other proposed actions or parts of proposed actions that are related to each other closely enough to be, in effect, a single course of action must be evaluated in the same EA or EIS (see 40 CFR §§ 1502.4(a) and 1508.25(a)(1), CEQ Regulations).

Importantly, the concept of segmentation when applied to connected actions, is also discussed in the same FAA Order:

A proposed action cannot be segmented by breaking it down into small component parts to attempt to reduce impacts (see 40 CFR § 1508.27(b)(7), CEQ Regulations).

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It is the concern of the Board that the Project represents an action that has been segmented from other connected actions in violation of 40 CFR § 1508.27(b)(7), CEQ Regulations.

Due to the potential segmentation of the connected actions associated with the Project, the Project NEPA process must also consider those cumulative impacts associated with cumulative actions connected to the Project. Per 40 CFR § 1508.25(a)(2), CEQ Regulations, "[c]umulative actions should be discussed in the same EIS."

Even if the FAA somehow reaches the determination that all of the projects planned at the Trenton-Mercer Airport are not connected actions, the projects should at least be considered similar actions as defined in FAA Order 1050.1f. As such, the cumulative impacts of all actions should be considered in a single NEPA document:

Similar actions, such as those with common timing or geography, should be considered in the same environmental document when the best way to assess their combined impacts or reasonable alternatives to such actions is in a single document (see 40 CFR §§ 1502.4(b) through (c) and 1508.25(a)(3), CEQ Regulations).

Past, present, and future airport actions, whether they are connected or similar actions as defined in the Order, all also have cumulative impacts on the same affected environment. Per FAA Order 1050.1f, the "Affected Environment section should include critical background information of past, present, and reasonably foreseeable future actions."

Furthermore, it is the responsibility of Project representatives and the FAA to consider cumulative impacts of not only connected actions at the airport property but also those off-airport projects that may impact the surrounding communities when combined with on-airport projects as discussed in the two aforementioned FAA orders:

...impacts associated when analysts cumulatively consider the project's impacts with those of past, present and reasonably foreseeable actions on or off-airport (paragraph 9.q). those impacts may exceed one or more significant impact thresholds. Therefore, EA and EIS preparers must consider the impacts the airport project and the complex of past, present, and reasonably foreseeable projects affecting the same resources.

It is also of note that the FAA also provides an example of a how a terminal project, likely not dissimilar from the Project, must be considered in the NEPA document:

Note: Here, terminal area relocation is the principal action justifying the project, but the effects due to disrupting the community or other impacts due to highway or housing relocation must be part of the total proposal.

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The Board formally requests that the Project addresses the issues discussed above and that they include a review of potential off-airport impacts to both New Jersey and Pennsylvania communities.

In addition, the Township's Trenton-Mercer Airport Review Panel (Panel) has provided the following questions and comments based on the Panel's review of the Project to date:

1. Airport planners must re-evaluate their forecasts, since the 2017 actuals are believed to be at the 2035 forecast already.
 - a. What are the 2017 actuals?
 - b. What is realistic for 2035 based on 2017 statistics?
 - c. How can they be reconciled?
2. Airport planners must be more specific about capacity planning.
3. Airport planners must specifically address quality of life issues, including but not limited to the following:
 - a. health and safety within our community due to air, water, land, and noise pollution;
 - b. vibration damage;
 - c. disruptions to sleep; and
 - d. disruptions to school activities.
4. Airport planner must include Pennsylvania communities in all analyses of surrounding areas.
5. Airport planners must detail the safety issues for the increased level of flights and what disaster plans are in place.
6. Airport planners must address the noise impacts of the increased traffic.
 - a. Reference is made to the FAA's Order Withdrawing a FONSI/ROD dated February 23, 2006, which includes footnote #3:
 - i. The analyses of Build Alternative 2 revealed that that alternative would likely cause sufficient noise impacts that would require the preparation of an Environmental Impact Statement (EIS).
7. Airport planners must consider the impact on property values and the tax base of surrounding communities in New Jersey and Pennsylvania
8. What evaluation has been done on cultural resources in the area? Under Section 106 of the National Historic Preservation Act, federal agencies must "account [for] the effect of their actions on structures eligible for inclusion in the National Register of Historic Places." *Ill. Commerce Comm'n v. ICC*, 848 F.2d 1246, 1261 (D.C. Cir. 1988). In fulfilling this obligation, agencies must consult with certain stakeholders in the potentially affected areas, including representatives of local governments. See 36 C.F.R. § 800.2(a)(4), (c)(3). If an agency determines that no historic structures will be adversely affected, it still has to "notify all consulting parties"—including a representative of the local government—and give them any relevant documentation. *Id.* § 800.5(c).
9. Airport planners must evaluate the cumulative impact of the activities at the airport over the planning period, not just the one incremental activity, to be valid and to reflect what is actually going on at the airport over the past years.
10. How many flights a day are possible at maximum utilization?
 - a. Based on maximum utilization, what are the potential cumulative impacts to surrounding communities?

In addition to the comments provided above, The Township incorporates by reference, and in their entirety, all other comments submitted by individuals, entities (public and private) and all

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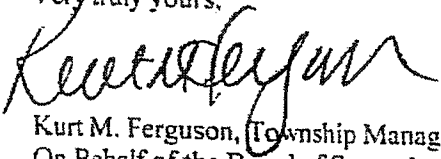
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respondents, as if submitted by the Township as included in this response/these comments. Specifically, the Township directs Recipient's attention to the submissions and comments from Residents for Regional Traffic Solutions ("RRTS"), a Lower Makefield-based interest group, focusing on issues related to transportation, infrastructure, and the impact of transportation-related decisions on the Township and regional populations.

The Board respectfully submits these comments and questions to the Project as part of the FAA's NEPA process. As stakeholders and an affected party, the Board, as a representative of the Township, looks forward to the Project's detailed responses. We hope that the airport can be a good neighbor.

Very truly yours,



Kurt M. Ferguson, Township Manager
On Behalf of the Board of Supervisors

KMF/bze
Enclosures

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Attachment G

(page 1 of 2)

22/68

BRIAN K. FITZPATRICK
1st District, PENNSYLVANIA

COMMITTEE ON FOREIGN AFFAIRS

COMMISSION ON SECURITY AND
COOPERATION IN EUROPE

COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE



Congress of the United States

House of Representatives

Washington, DC 20515

1722 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-4278

1717 LANGHORNE-NEWTOWN RD.
SUITE 400
LANGHORNE, PA 19047
(215) 678-0102

May 9, 2019

Elaine L. Chao
Secretary
U.S. Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

Dan Elwell
Acting Administrator
Federal Aviation Administration
800 Independence Ave SW
Washington, DC 20591

Dear Secretary Chao and Acting Administrator Elwell,

I am writing to you today regarding an issue of great concern within my district. The Trenton-Mercer Airport (TTN) is a county-owned airport located approximately four miles northwest of the City of Trenton in Rwing Township, Mercer County, New Jersey and less than four miles from the eastern edge of my district in Bucks County. The flight path and noise associated with TTN directly impact the constituents who reside in my district.

TTN has proposed and implemented several projects over the past 25 years with little input from the surrounding community as required by the National Environmental Policy Act of 1969 (NEPA) and the Federal Aviation Administration (FAA) Order 1050.1F - Environmental Impacts: Policies and Procedures.

Most recently, TTN has proposed a comprehensive Master Plan that calls for large-scale enhancements to the terminal, taxiway, and runway in an effort to increase usership at TTN. The plan would allow for larger planes and lower altitudes in addition to increasing the number of flights per day. Unfortunately, it appears TTN may have chosen to segment these projects in an effort to reduce the level of NEPA analysis required from an Environmental Impact Statement (EIS) that would require a broader scale cumulative impact analysis that would take into account potential impacts to my constituents in Pennsylvania to smaller, lesser-scale Environmental Assessments (EAs) for each project such that cumulative impacts and mitigation are not considered in a meaningful way.

The planned airport expansion has the potential to negatively impact the residents, businesses, and community that comprise PA-01 as the flight paths associated with the airport is directly above my district. Any project that has the potential to negatively impact the district is of great concern to me. It is my responsibility as its representative in Congress to advocate for the health, safety, and welfare of its citizens. As such, I have major concerns with the process followed by TTN and the potential impacts to our community. These concerns were addressed in a meeting

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Attachment G

(page 2 of 2)

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held at my office on June 18, 2018. Several community leaders attended this meeting to voice their concerns and discuss potential solutions. Unfortunately, representatives from TTN and Mercer County did not attend the meeting.

I am asking that the appropriate level of NEPA analysis is conducted for the planned TTN expansion. A thorough review of TTN's historic projects and the FAA's methodology for considering cumulative impacts will show that segmentation, a concept not allowed for by NEPA regulations and the FAA's own orders, has taken place over many years.

I appreciate your attention to this matter and look forward to hearing from you.

Sincerely,

Brian K. Fitzpatrick

Brian Fitzpatrick
Member of Congress

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BRIAN K. FITZPATRICK
1ST DISTRICT, PENNSYLVANIA

COMMITTEE ON FOREIGN AFFAIRS

COMMISSION ON SECURITY AND
COOPERATION IN EUROPE

COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE



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(215) 679-8102

Congress of the United States

House of Representatives

Washington, DC 20515

24/68

November 12, 2019

Elaine L. Chao
U.S. Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

Dear Secretary Chao,

I am writing today in response to the letter I received from the Federal Aviation Administration dated August 6, 2019 regarding Trenton-Mercer Airport (TTN). In the letter, Acting Administrator Daniel K. Elwell indicated that the FAA has reviewed the projects at TTN and believes that the airport has not engaged in segmentation and has properly evaluated cumulative impacts. As stated in my letter addressed to the U.S. Department of Transportation dated May 9, 2019, I continue to be concerned that TTN has chosen to segment these projects to reduce the level of environmental study required. Additionally, I am greatly concerned that the TTN has overlooked potential existing ground water contamination while conducting their Environmental Assessment (EA). Therefore, I am requesting that the FAA review the mechanisms used by TTN to complete their Environmental Assessment to ensure that all environmental impacts, including threats to the safety of ground and drinking water, be evaluated.

The FAA, following the NEPA process, issued a FONSI/ROD for the TTN Runway Protection Zone and Obstruction Mitigation project after evaluating the Environmental Assessment. The TTN EA indicates that the proposed project will result in the clearing of 2.3 acres of trees within 100 feet of contaminated groundwater associated with the Naval Air Warfare Center (C&S Companies Environmental Assessment for Runway Protection Zones and Obstruction Mitigation page 3-24, July 2019). Although several contaminants are listed in the EA, there is no mention of the presence of PFOS/PFOA. However, according to a 2018 Congressional Brief by Maureen Sullivan, Deputy Assistant Secretary of Defense, the DoD monitored groundwater wells around the Naval Air Warfare Center Trenton and found that the majority tested near above the EPA LHA for PFOS/PFOA. Of the 38 wells tested, 23 tested above the EPA LHA with readings in the range of 178 – 27,800 PPT. (FY18 HASC on PFOS-PFOA, page 36) Considering the proximity of the wells to TTN, and how quickly PFOS/PFOA contaminations bioaccumulate, it is likely that the contaminants have spread to neighboring wells and ground water. Given the health risks associated with PFOS/PFOA exposure, it is critical that the environmental assessment for any project at TTN take these risks into account.

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It is my understanding that the spirit of the NEPA process is to ensure that project impacts are reviewed in their totality to ensure that proper environmental protections are maintained. I share the concern of my constituents that the TTN master plan and RPZ project impact studies are not in keeping with the spirit of NEPA. I urge the TTN management, their consultants and the FAA to consider cumulative impacts of not only connected actions at the airport property, but also those off-airport factors that may impact the surrounding communities.

I appreciate your attention to this matter and look forward to hearing from you.

Sincerely,



Brian Fitzpatrick
Member of Congress

11/13

BRRAM

25 S. Main St # 208

Yardley, PA 19067

bucks residents for responsible airport management

26/68

Congressman Brian Fitzpatrick*
1717 Langhorne Newtown Rd., Suite 400
Langhorne, PA 19047
14 June 2019

26/68

Dear Congressman Fitzpatrick,

It's been almost a year, June 18, 2018, when representatives from BRRAM, area Bucks County Municipalities, FAA Officials from Washington, DC, and you sat down in your office to discuss the on-going development and expansion of the Trenton Mercer Airport (TTN). At that time, several issues were raised and there was much discussion regarding how to best mitigate this expansion to make it equitable as well as comply with environmental regulations. Some of our concerns included:

- Your constituents have been experiencing a dramatic increase in noise, vibrations, air pollution, sleep disruptions and there were/are safety concerns with the frequency of large commercial aircraft flying very low at all hours during takeoff and landing.
- District constituents are getting the brunt of the negative impacts from TTN operations and the TTN Airport and New Jersey politicians have failed to take steps to share these impacts equitably amongst surrounding NJ and PA communities, nor been willing to meet to discuss.
- The TTN Airport and NJ politicians have neglected to initiate a transparent and voluntary written request to the FAA asking that the FAA work with them on a FAR Part 150 Program to help with Noise Abatement.
- The TTN Airport and NJ politicians continue to disregard to comply with environmental regulations. Over the past 22+ years, segmentation has been used to allow unchecked airport expansion.
- TTN has been unwilling to perform an *inclusive* Environmental Impact Statement that would examine the cumulative impacts of past and proposed unchecked expansion on all affected NJ and PA communities

Since that time, we had several on-going meetings. Attendees have included Senator Santarsiero(convener) & representatives from his office, representatives from your office, State Representative Perry Warren, representatives from his office, Evan Stone (Executive Director of the Bucks County Planning Commission), Lowe Makefield Twp. (LMT)Board of Supervisors Chair Dan Grenier & members of the LMT TTN Airport Review Panel, Yardley Borough Council Members David Bria & Caroline Thompson and grass roots organizations. Some progress has been made and a cooperative atmosphere has prevailed. All efforts have been appreciated.

BRRAM's concern evolves around the speed in which things are moving. TTN continues to move ahead while stalling to meet with any officials. This is NOT a new tactic. We saw it many years ago. At that time, Representative Greenwood assertively reached out and kept the process moving with regards to

12/13

BRRAM

bucks residents for responsible airport management

25 S. Main St # 208

Yardley, PA 19067

27/68

discussions with those in New Jersey. He pushed for answers with regards to process and accountability from a legislative and FAA perspective.

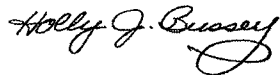
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We need this type of intervention again now. There needs to be meetings and action demanding that TTN, NJ and the FAA provide accurate and open responses to issues like Return on Investment(ROI), Segmentation, adhering to the NEPA regulations and honoring the original statement FAA Statement of 2006 (foot note 3 on page 2 of the document "**ORDER WITHDRAWING Finding of No Significant Impact/Record of Decision dated February 23, 2006 for the Trenton- Mercer Airport (TTN), Terminal Replacement and Other Projects in the Capital Improvement Program**" that states, "*the analysis of Alternative Build 2 revealed that alternative would likely cause sufficient noise impacts that would require the preparation of an Environmental Impact Statement [EIS]*". This alternative Build 2 is the exact plan that TTN is going to implement.

With over 700 members of BRRAM we are concerned regarding the long-term outcome should this expansion continue to go unchecked and TTN continues to disregard due process of the law.

We sincerely hope that you will move forward with gusto and keep pressure on for results. We cannot afford to sit idly by. If we do, the airport that will be built will be not just regional, and the cone of impact for commercial aircraft flying over your constituents will grow exponentially. It will be too late to protect the welfare of all of us you represent. We hope to hear from you regarding an updated meeting and addressing the multiple issues of this concern soonest.

Respectfully submitted,



Holly J Bussey, President

PS: Received word (6/14/19 10:30am) about the introduction of H.R. 3001 – Quiet Communities Act of 2019 with Congressman Fitzpatrick as an original co-sponsor. This bill would reestablish the Office of Noise Abatement and Control in the U.S. EPA. Look forward to hearing more about this in particular: 1)Timing of passage?; 2) when it would be implemented; 3)impact on TTN development and expansion processes currently.

Cc: State Senator Steve Santarsiero*

Sue Simon, District Director for Congressman Fitzpatrick*

Kyle Melander, Director of Constituent Services for Congressman Fitzpatrick

State Representative Perry Warren*

Evan Stone, Executive Director of the Bucks County Planning Commission

Dan Grenier, Chairman, Lower Makefield Twp. (LMT) Board of Supervisors

David Bria and Caroline Thompson Yardley Borough Council Member

Dan O'Brien, Director of Local Government Relations for Senator Santarsiero

Dan Fagan, Local Government Assistant to Senator Santarsiero

Ryan Bevitz, Legislative Assistant to State Rep. Perry Warren

Richard Preston LMT TTN Review Panel

Susan Herman; President, Residents for Regional Traffic Solutions, Inc.

**denotes sent by certified mail. Others by email*

13/13

New Jersey Clean Air Council Public Hearing held on July 30, 2020:
RE: Past, Present, and Future: Air Quality Around Our Ports and Airports

Written Statement Submitted for the record.

Trenton Threatened Skies, Inc. is a non-profit 501(c)3, led by a group of concerned Mercer County residents, who have lived here for decades, loving, enjoying, and contributing in many ways to our community, with its beautiful green spaces, caring residents, peaceful atmosphere and organic farms. Our mission is to gather, review, analyze, and disseminate information regarding the Trenton-Mercer Airport, in Ewing, New Jersey, with respect to the environmental, public health, safety, and economic impacts of the proposed and future operations of the airport.

Emerging health data links aviation emissions and noise to heart attacks, asthma, pregnancy complications, learning, behavioral and psychiatric issues. Our home values can be expected to decrease up to 30% with increased commercial flight volume and our air and water quality will certainly deteriorate.

We have become increasingly alarmed because our local Mercer County authorities have been unresponsive to our concerns. Trenton Mercer Airport continues to seek and win approvals for a number of projects without regard to the cumulative impact on the environment of surrounding Mercer County communities and our public health. There are at least twenty-five (25) in-process individual projects that have either been approved, are in the process of seeking approval, or are planned in the near future as "unrelated" or "independent" improvements. All of these individually considered projects are outlined and proven to be related & interdependent in the Master Plan of 2018. The Airport Layout Plan (ALP), part of the Master Plan, clearly identifies a proposed terminal expansion, the runway protection zone, and development of Parcel A of the Naval Air Warfare Center where there are known PFOS, VOC's, mercury and other contaminants.

Prior to the CoVid 19 Pandemic, Trenton Mercer Airport's annual flight volume had already exceeded the 2035 estimates used to gain approval from the FAA for expansion and presented in public hearings in 2018. Mercer County residents are already subjected to a record number of overflights & vehicular through traffic and this local airport expansion will further degrade our already failing air quality.

The particles in airplane exhaust are directly tied to heart disease and asthma. Heavy metals and jet soot exhaust will put our local food at risk for contamination. Toxic emissions from planes flying below 900 feet are endangering visitors and wildlife at Mercer Meadows and Rosedale Park. Unregulated airplane exhaust impacts on our air quality has been seriously underestimated and the citizens of Mercer County implore the New Jersey Clean Air Council to vigorously oppose the expansion plans of the Trenton-Mercer Airport.

Sincerely,

Robin Karpf, M.D., President
Trenton Threatened Skies, Inc.
800 Denow Road, Suite C #375
Pennington, NJ 08534

BRRAM

25 S. Main St # 208

Yardley, PA 19067

bucks residents for responsible airport management

29/68

12 August 2020

29/68

TO: New Jersey Clean Air Council Public Hearing held on **July 30, 2020**.

Written Statement Submitted for the record

RE: **Past, Present, and Future: Air Quality Around Our Ports and Airports**

For over 25 years, BRRAM** has expressed concern about the environmental impacts of the Trenton-Mercer Airport on the health and well-being of the residents of the surrounding areas.

The newest health data links aviation emissions and noise to heart attacks, asthma, pregnancy complications, learning, behavioral and psychiatric issues.

Ultrafine particle exposure, produced from aircraft emissions, has been linked with adverse cardiovascular and respiratory health effects (and even possibly the risk of dementia (<https://deohs.washington.edu/hsmblog/trac-pollution-and-dementia>)). Studies have shown that airports can increase particle number concentrations up to 4-fold at 10 km downwind.

According to an article published in the Guardian, "New research has linked air pollution nanoparticles to brain cancer for the first time... Environmental risks like air pollution are not large in magnitude – their importance comes because everyone in the population is exposed," said Scott Weichenthal, at McGill University in Canada, who led the study. "So when you multiply these small risks by lots of people, all of sudden there can be lots of cases, which is meaningful, particularly given the fact that these tumors are often fatal."

When airports expand it is documented that home values can be expected to decrease up to 30%. Studies clearly show that air and water quality also deteriorate with airport expansion and increased air traffic.

Currently, the Trenton-Mercer Airport is doggedly pursuing a Master Plan to expand the airport, over the public outcry about health, noise and property value impacts.

Residents are increasingly alarmed about the large number of projects that TTN has sought approvals for, without regard to cumulative impact on public health and the environment in surrounding New Jersey & Pennsylvania communities. There are at least twenty-five (25) in-process individual projects

Pg 1/2

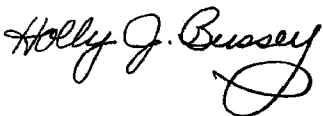
that have been identified that have either been approved, are in the process of seeking approval, or are planned in the near future as "unrelated" or "independent" improvements.

BRRAM opposes any form of expansion or renovation of TTN until the environmental issues of noise, pollution and safety are first identified and resolved. BRRAM believes that Trenton-Mercer Airport should perform a full Environmental Impact Statement (EIS) that would include not only the grounds of the airport, but the surrounding 10-mile radius that is impacted by the airport in both Pennsylvania and New Jersey.

Members of BRRAM from NJ and PA urge the New Jersey Clean Air Council to vigorously oppose the expansion plans (all projects) of the Trenton-Mercer Airport (TTN). Additionally, we implore that TTN be required to undergo rigorous environmental review (EIS).

Thank you for your kind attention.

Sincerely,



Holly J Bussey, President
BRRAM

***Bucks Residents for Responsible Airport Management (BRRAM) is a non-profit volunteer organization comprised of over 1,000 concerned citizens. BRRAM works with other organizations in both Pennsylvania and New Jersey, as an advocate for our residents, to help demand accountability from TTN and that TTN be a "good neighbor" respecting the environmental health, safety and well-being of all its neighbors.*

Cc: Sue Simon <sue.simon@mail.house.gov>,
kyle melander <kyle.melander@mail.house.gov>,
Santarsiero, Senator Steve" <Steve.santarsiero@pasenate.com>,
Rose Wuenschel <Rosemary.wuenschel@pasenate.com>,
Shannon.Sticker@pasenate.com
"Fagan, Dan" <dan.fagan@pasenate.com>,
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ryan bevit <rbevit@pahouse.net>,
CommEllisMarseglia@buckscounty.org,
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CommDiGirolamo@buckscounty.org,
"Stone, Evan" <estone@buckscounty.org>

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R.R.T.S.

Residents for Regional Traffic Solutions, Inc.

PO Box 285

Newtown, PA 18940

rrtsbucks5@gmail.com

New Jersey (NJ) Clean Air Council Public Hearing Held on July 30, 2020

RE: Past, Present, and Future: Air Quality Around Our Ports and Airports

WRITTEN TESTIMONY SUBMISSION (via email, in Microsoft Word)

August 12, 2020

Pages: 11-page cover letter

Attachments: 8, plus 1 VIDEO

BEFORE IT IS TOO LATE: Our "ASKS" of the NJ Clean Air Council & the NJ Department of Environmental Protection (NJ DEP)

1.) We implore the NJ Clean Air Council and the NJ DEP to vigorously & formally oppose all current and proposed expansion plans of Trenton-Mercer Airport (TTN), including the **Master Plan of 2018** that calls for:

- ...building a Passenger Terminal that is five (5) times the size of the current terminal,
- ...the **Runway Protection Zone & Obstruction Mitigation Project**, and
- ...twenty-five (25) individually-considered, segmented-out projects

These expansion plans will result in toxic air & water pollution that will cause irreparable harm to affected residents in Mercer County, NJ and Bucks County, PA.

TTN continues to recklessly move forward with plans to expand the airport substantially, with no regard for the water, air, wildlife, and other environment impacts on its citizens in the surrounding region. The former Naval Air Warfare Center in West Trenton, NJ (NAWC) is known to have groundwater polluted with PFAS* and other toxic chemicals. TTN's expansion plans will increase the water run-off through the former NAWC site and into the Delaware River, which is the drinking water supply for thousands of Mercer County and Bucks County citizens. **PFAS contamination of drinking water is linked to harming children's neurological development, kidney cancer and testicular cancer.**

** PFAS- per-and polyfluoroalkyl substances – are a class of man-made chemical compounds used in producing products such as non-stick cookware coatings, fire retardant furniture, and foam used in firefighting. PFOA, once used to make Teflon, and PFOS, once used in Scotchgard, are among the most widely known, yet there are hundreds more still being used in manufacturing.*

2.) We also implore the NJ Clean Air Council and the NJ DEP to develop an actionable response to meaningfully address the toxic air & water pollution that *ALREADY EXISTS TODAY*. TTN has *already* experienced large-scale expansion over the past 20 years, while skirting around having to do a Cumulative & Expansive Environmental Impact Statement (EIS) to measure the **cumulative impacts** on affected Mercer and Bucks County municipalities. The airport avoided having to do the EIS by breaking expansion into smaller projects, so that they were only subjected to narrow, isolated Environmental Assessments (EAs). This is segmentation, this is disingenuous, and this *already* threatens the health, safety & welfare of affected NJ and PA citizens.

SUMMARY

Residents in Mercer County (NJ) & Bucks County (PA) ask you to vigorously & formally oppose TTN's current & proposed expansion plans because...

1.) ...the airport's continued reckless, unchecked expansion will harm them & their families, as explained in the VIDEO at below link:

<https://www.youtube.com/watch?v=ZHU7m1Rzvyw&feature=youtu.be>

2.)...Health

- Airport plans will change storm drainage; there is known PFAS & other toxic chemical contamination of groundwater on airport property & the NAWC site, which could make TTN the next Flint [Michigan]. PFAS contamination of drinking water is linked with harming children's neurological development, kidney cancer and testicular cancer. (See attached Philadelphia Inquirer article titled *PFAS testing planned for 2 counties: Adults and children from Bucks and Montco are being sought for a national study on the chemicals.*)
- U.S. Senators Bob Menendez (NJ) & Bob Casey (PA) are amongst 19 senators who want the U.S. government to find out if exposure to PFAS chemicals can make people more vulnerable to coronavirus.
- The particles in airplane exhaust are directly tied to heart disease and asthma. The dangerous, invisible, microscopic exhaust particles travel up to ten (10) miles outside the flight path. Even if residents cannot see the planes, they are at risk.
- Eat Locally? Thousands of residents depend on fresh fruits, vegetables & meats grown in Lawrence & Hopewell Townships. Heavy metals & organic compounds in airplane exhaust put our food at risk of contamination.
- There is a wealth of data about the negative impact of noise on learning, which is compounded by both vibration and by exhaust, as well as noise on hearing loss, particularly in children.

Environment

- Researchers are equating unregulated airplane exhaust to an urban freeway network & are warning that the air quality impacts have been seriously underestimated.
- Toxic emissions from planes flying below 900 feet endanger joggers, cyclists, and wildlife at Mercer Meadows Park & the Pole Farm Bird Sanctuary.
- Mercer & Bucks County residents are already subject to a record number of overflights & vehicular through-traffic; local airport expansion will further degrade our poor air quality. [Mercer County (NJ) is rated "F" in Air Quality by the American Lung Association.]
- The long term effects of ongoing, increased emissions in close proximity to residential areas and watershed tributaries cannot be ignored.

Financial

- Home values are estimated to decrease up to 30% near an airport.
- Mercer County has invested ?\$\$\$ in the airport over the last 20 years. What financial benefit has accrued and/or is flowing to the county and its citizens?

Irresponsible Government

- Past & current expansion has been divided into smaller projects to avoid doing a Comprehensive & Expansive Environmental Impact Statement (EIS) that measures the ***cumulative impacts*** on **ALL** affected NJ and PA municipalities.
- The residents who have been, and will continue to be, hardest hit by the airport's success in skirting around doing the EIS, are those residing in Ewing Township (NJ) and the City of Trenton (NJ). Environmental Justice & Social Justice are not being practiced.
- There has been (a) a history of blatant disregard for authentically including the public in the decision-making process for airport projects, (b) an unconscionable lack of transparency and (c) an **intentional neglect** on the part of New Jersey politicians & the airport to do whatever it takes to protect the health, safety & welfare of affected NJ and PA citizens.
- Annual flight volume through early 2019 has already exceeded the 2035 flight estimates presented to the community by 17,238 take-off/landings, 16 YEARS EARLY & PRIOR TO TERMINAL EXPANSION
- Mercer County Freeholders just authorized a \$54,000 contract to market the airport in the middle of a pandemic, when the future demand for air travel is completely uncertain and many airlines may go out of business
- During the unprecedented pandemic with unemployment and decreased tax revenues, why are much-needed county \$ being spent on the airport?

BACKGROUND

1.) RRTS, along with BRRAM (Bucks Residents for Responsible Airport Management) and Mercer County - based grassroots groups, has been concerned with the expansion of TTN for over 20 years. TTN expanded “under the radar” throughout the past 20 years, by approving and implementing numerous individual projects, whose whole equaled large-scale expansion. By dividing the expansion into segments, TTN has avoided having to do the Cumulative & Expansive Environmental Impact Statement (EIS) that would measure its **cumulative impacts** on ALL affected Mercer County, NJ & Bucks County, PA municipalities.

2.) Recently, residents are alarmed by the large number of projects that TTN has sought approvals for, without regard to **cumulative impact** on the environment, surrounding NJ & PA communities, and public health. There are at least twenty-five (25) in-process individual projects that we can list that have either been approved, are in the process of seeking approval, or are planned in the near future as “unrelated” or “independent” improvements.

All of these segmented, individually- considered projects are *outlined and proven to be related & interdependent in the Master Plan of 2018*. The Mercer County Website describes the Master Plan as such: “*the Airport Master Plan is essentially a facility planning study that sets forth a conceptual framework for possible future airport development*”. The **Airport Layout Plan (ALP)**, part of the Master Plan, clearly identifies a proposed terminal expansion, the **Runway Protection Zone & Obstruction Mitigation Project (RPZ Project)**, and development of Parcel A of the Naval Air Warfare Center (NAWC) where there are known PFOS, VOCs, mercury and other contaminants.

The danger of considering these projects separately was demonstrated at the Mercer County Freeholder Board Webex meeting on 4/23/20 when the development of Parcel A of the NAWC was discussed. Airport attorney, Mr. Markind, referred to the remediation barrier on Parcel A as being “in total disrepair” several times. There are known PFOS, VOCs, mercury and other contaminants on Parcel A and the adjacent Parcel B. Both groundwater and surface water contamination have been reported. While Parcel B continues to be managed by the Navy, it appears that Parcel A is going to be cleaned up privately as part of the Flightserv lease agreement. It was not clear, and the Freeholders did not seem to know, who was overseeing & responsible for the project.

Residents are concerned that the **Parcel A FONSI** indicates that there is “no impact, due to no changes in storm water run-off”, ignoring the fact that the adjacent, massive **RPZ Project** changes are anticipated to affect storm run off by nearly 1.5 million (1, 500,000) gallons/year, as estimated by the Watershed Institute during the public comments portion of the **Environmental Assessment for the RPZ Project** (pg. P-200-202). This estimate relates only to **RPZ Project –associated** changes to landscape, and did not account for climate-change related increases in precipitation or the additional massive airport build-out, as described above.

It makes sense that the Parcel A remediation barrier should be repaired. It also makes sense that its ability to withstand both **RPZ Project – caused** and climate-related increases in storm drainage, be addressed well in advance of any **RPZ Project** structure removal. This is but one example of why these projects **MUST** be considered together.

3.) The attached 11/12/19 letter from PA Congressman Brian Fitzpatrick to the U.S. Department of Transportation **RE: the RPZ Project** states,

“...I continue to be concerned that TTN has chosen to segment these projects to reduce the level of environmental study required. Additionally, I am greatly concerned that TTN has overlooked potential existing groundwater contamination while conducting their Environmental Assessment (EA). Therefore, I am requesting that the FAA review the mechanisms used by TTN to complete their Environmental Assessment to ensure that all environmental impacts, including threats to the safety of ground and drinking water be evaluated.....Although several contaminates are listed in the EA, there is no mention of the presence of PFOS/PFOA. However, according to a 2018 Congressional Brief by Maureen Sullivan, Deputy Assistant Secretary of Defense, the DoD monitored groundwater wells around the Naval Air Warfare Center Trenton and found that the majority tested near above the EPA LHA for PFOS/ PFOA...Given the health risks associated with PFOS/PFOA exposure, it is critical that the environmental assessment for any project at TTN take these risks into account...”

RRTS has provided the Mercer County Freeholders with this letter several times during Public Comment at their meetings. Despite Congressman Fitzpatrick’s repeated communications regarding his concern that segmentation has occurred (and that there has not been appropriate environmental scrutiny of TTN’s cumulative impacts), it is the Federal Aviation Administration (FAA) who **routinely** responds that segmentation has not occurred. The problem is that the FAA is like the fox guarding the hen house. The agency has demonstrated that it is driven by a self-interested agenda that DOES NOT include protecting the safety & welfare of citizens. (See attached 2/21/20 Buchalter article titled Quiet Skies Congressional Caucus Gets Brush Off from FAA.)

4.) The Mercer County Freeholders maintain that the **RPZ Project** is motivated purely by safety concerns and will not change airport operations. This is bogus and disingenuous. Aviation Professionals have advised that IT DOES NOTHING to change the safety margin. WHAT IT DOES is enable more operations and better fleet mixes.

In Mercer County's own EA, in Chapter 4, it states,

"The existing runway length needs to be maintained or it will result in a loss of operations and/or operational restrictions for the Airbus 320/320neo and the Gulf stream IV/V during wet and slippery runway conditions."

We experience wet and slippery conditions right now – should those planes be operating from this airport now? If the Mercer Co. Freeholders truly thought that this project was purely for safety concerns (which they learned about in March 2015), they would be curtailing those operations right now. It is blatantly obvious that a key purpose for this project is to effectively lengthen the runway so that TTN can have the big jets safely fly in all conditions, move lower flying & heavily laden planes, and significantly increase airport operations.

5.) More than eighteen (18) months ago, TTN promised that there would be a Public Meeting held in Bucks County, PA for New Jersey & Pennsylvania residents to review the EA and the status of the multiple current & planned projects associated with the **Master Plan of 2018**. Recently, BRRAM formally gave public comment at a Mercer County Freeholder meeting to request that the meeting be held. BRRAM also sent a formal letter to Freeholder Chairman, Andrew Koontz, requesting same. Below is the 8/3/20 email response that BRRAM received from Chairman Koontz & Mercer Co. Administrator Lillian Nazzaro:

"We forwarded your communication to the County Administrator. Please see their response below.

LAURENTI, Mario

Confidential Aide to Freeholder Andrew Koontz

From: Nazzaro L. Lillian, Esq. <lnazzaro@mercercounty.org>

Sent: Monday, August 3, 2020 9:28 AM

To: Koontz, Andrew <akoontz@mercercounty.org>

Subject: RE: Mercer Freeholders Public Comment July 16 follow up - Request for Virtual Meeting on Trenton Mercer Airport

Chairman,

As previously discussed in Freeholder meetings, a public meeting will take place in Pennsylvania as soon as the EA is approved by the FAA. The County has every intention of going forward with the public meeting and residents of Pennsylvania will be advised accordingly. Finally, the meeting will most likely be a Tele Town hall meeting.

Thank you,

Lillian L. Nazzaro, Esq.
Mercer County Administrator"

This is unacceptable. It ignores the concerns of PA citizens and is not acting in good faith.

6.)At the 10/24/19 meeting of the Delaware Valley Regional Planning Commission (DVRPC) Board, RRTS gave public comment expressing the serious concerns that affected New Jersey & Pennsylvania residents have with the continued, unchecked expansion of TTN. The 11/17/19 GUEST OPINION that appeared in the local paper, THE ADVANCE OF BUCKS COUNTY, summarized our public comment. (See Guest Opinion titled An open letter to the DVRPC on Trenton-Mercer Airport in the attachment labeled **DVRPC-related communications**.)

In the 11/4/19 letter from Barry Seymour, DVRPC Executive Director, to Jennifer Solomon of the FAA (See 11/4/19 letter in attachment labeled **DVRPC-related communications**), it states,

“...As TTN continues to advance their improvement plans for the facility, residents of both Mercer County, NJ and neighboring Bucks County, PA have expressed concerns about potential environmental and social impacts created by any changes in facility operations. We strongly support the continued examination and consideration of these impacts and potential mitigation strategies, in accordance with the FAA guidelines...”

The DVRPC is disingenuous in its expression of concern for the health, safety & welfare of NJ and PA residents. **The following disturbing quotes are from DVRPC’s July 2014 publication titled 2040 Regional Airport System Plan (RASP), a plan that calls for expanding TTN far beyond an appropriate-sized local airport:**

On page 32, there’s a section titled “Trenton-Mercer (TTN), New Jersey” and the first sentence of the second paragraph states, *“The airport is marketing itself as an alternative to PHL [Philadelphia International Airport] and EWR [Newark’s Liberty International Airport], offering less hassle”.*

Page 1 is the “Executive Summary” which states this half way down the page, *“Therefore, the objectives for the 2040 RASP took these factors into account, and the following priorities were agreed upon by the RASP subcommittee: 1. Expand commercial air service capacity within the region...3. Sustain and improve infrastructure to attract more users...This report is being prepared with the support of the Federal Aviation Administration (FAA) ...”*

Page 3 states this in the first paragraph, *“ ‘Aviation’ to most people in the region will likely be associated with Philadelphia International Airport (PHL), the 11th busiest airport in the world (in terms of aircraft operations), but the Delaware Valley is also served by two other commercial service airports, Trenton-Mercer (TTN) and Wilmington (ILG)...”*

Page 4 is “Figure 1: Regional Airport System Map”. TTN has the same icon as Philadelphia International Airport (PHL) and Wilmington (ILG).

Halfway down page 5 it states, “*One specific economic aid for the region comes with the availability of U.S. Customs and Border Protection facilities at the region’s airports. All three commercial service airports – PHL, TTN, and ILG- have these facilities.*”

On page 7, it states this in the third paragraph, “*Commercial service airports serve scheduled service airlines, corporate aviation, and in the case of ILG and TTN, some military operations.*”

The DVRPC’s plan to expand TTN into a “booming airport” (as referenced on page 43 of DVRPC’s 2014 publication titled [*resilience*]), is inconsistent with its stated vision on its website Home Page on 2/19/20 which stated,

“The Delaware Valley Regional Planning Commission is the federally designated Metropolitan Planning Organization for a diverse nine-county region in two states: Bucks, Chester, Delaware, Montgomery, and Philadelphia in Pennsylvania; and Burlington, Camden, Gloucester, and Mercer in New Jersey.

DVRPC’s vision for the Greater Philadelphia Region is a prosperous, innovative, equitable, resilient, and sustainable region that increases mobility choices by investing in a safe and modern transportation system; that protects and preserves our natural resources while creating healthy communities; and that fosters greater opportunities for all.”

(See attachment labeled **DVRPC-related communications: DVRPC’s Vision on 2/19/20 website Home Page**)

The DVRPC should re-examine its plans to make TTN a “booming airport” and re-prioritize the importance of clean water to the region as one of the primary goals.

7.)It is unconscionable that New Jersey politicians, from the local level up through the Federal level, ignored the attached 9/30/19 letter from RRTS titled:

**RE: IMMINENT PROPOSED EXPANSION OF TRENTON-MERCER AIRPORT (TTN):
New Jersey & Pennsylvania residents living in municipalities surrounding TTN, worry that it will cause irreparable harm to their health, safety & welfare. The harm is likely to include, but not be limited to, irreparable damage to the water supply.**

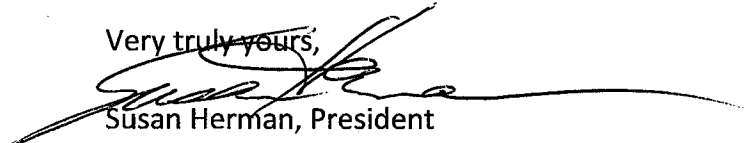
Our 9/30/19 letter is a formal, integral part of this written comment that we are submitting. We respectfully request that the NJ Clean Air Council & Commissioner McCabe read it in its entirety. If it is a problem that it is in pdf format, note that Commissioner McCabe received a hard copy of it via FedEx (signature required).

8.) Attached is our ORAL TESTIMONY given at the 7/30/20 Public Hearing (in Microsoft Word).

9.) FOR RRTS's USE ONLY, we have also attached a pdf comprised of our written and oral testimony for the 7/30/20 NJ Clean Air Council Public Hearing.

Thank you for the opportunity to comment.

Very truly yours,



Susan Herman, President
Residents for Regional Traffic Solutions, Inc.*

**Residents for Regional Traffic Solutions, Inc. (RRTS) is a non-profit organization founded in August, 2001. Its purpose is to engage in public awareness as to traffic issues in the Central Bucks County area. RRTS focuses on issues related to transportation, infrastructure and the impact of transportation-related decisions on regional populations. In the case of Trenton-Mercer Airport, the impacted regional populations are in Mercer County, NJ & Bucks County, PA.*

Attachments:

- RRTS WRITTEN TESTIMONY cover letter: 7/30/20 NJ Clean Air Council Hearing **(in Microsoft Word)**
- 7/13/20 Philadelphia Inquirer article: PFAS testing planned for 2 counties
- 11/12/19 letter from PA Congressman Fitzpatrick to U.S. DOT
- 2/21/20 Buchalter article: Quiet Skies Congressional Caucus Gets Brush Off from FAA
- DVRPC-related communications: 11/17/19 Guest Opinion in THE ADVANCE, 11/4/19 letter from DVRPC to FAA, DVRPC's Vision on 2/19/20 website Home Page
- 9/30/19 letter from Residents for Regional Traffic Solutions, Inc. (RRTS)
RE: IMMINENT PROPOSED EXPANSION OF TRENTON-MERCER AIRPORT (TTN):
New Jersey & Pennsylvania residents living in municipalities surrounding TTN, worry that it will cause irreparable harm to their health, safety & welfare. The harm is likely to include, but not be limited to, irreparable damage to the water supply.
- RRTS ORAL TESTIMONY: 7/30/20 NJ Clean Air Council Hearing **(in Microsoft Word)**
- FOR RRTS USE ONLY:** 7/30/20 NJ CAC Hearing, written and oral testimony pdf
- VIDEO titled Trenton Airport Expansion: Your Neighbors' Concerns (youtube link provided)

CC: All individuals/groups will receive this via email. Those asterisked will also receive it via Certified Mail, Return Receipt.

FEDERAL LEVEL:

U.S. Senator Bob Casey (PA)*
U.S. Senator Pat Toomey (PA)*
Congressman Brian Fitzpatrick (PA)*
U.S. Senator Bob Menendez (NJ)*
U.S. Senator Cory Booker (NJ)*
Congresswoman Bonnie Watson-Coleman (12th Cong. District-NJ)*
Congressman Tom Malinowski (7th Cong. District-NJ)*
Congressman Chris Smith (4th Cong. District-NJ)*
Congressional Quiet Skies Caucus

STATE LEVEL:

Governor Tom Wolf (PA)*
Secretary Patrick McDonnell, PA DEP*
Secretary Leslie Richards, PA DOT*
PA Attorney General Josh Shapiro*
Senator Steve Santarsiero (PA)*
State Representative Perry Warren (PA)*
Governor Phil Murphy (NJ)*
Commissioner Catherine McCabe, NJ DEP*
Commissioner Diane Gutierrez-Scaccetti, NJ DOT*
Senator Shirley Turner (D15-NJ)*
Senator Linda Greenstein (D14-NJ)*
Senator Christopher Batemen (D16-NJ)*

COUNTY LEVEL:

Mercer County Executive Brian Hughes*
Mercer Co. Freeholders (NJ): Cimino*, Koontz (chair)*, Cannon*, Walter*, Frisby*, Colavita*, Melker*
Bucks County Commissioners (PA): Ellis-Marseglia (chair)*, Harvie* DiGirolamo*

MUNICIPAL LEVEL:

Members of Councils/ Committees in Mercer County (NJ):

East Windsor Twp.: c/o president (pres.)*
Ewing Twp.: c/o president*
Hamilton Twp.: c/o pres.*
Borough of Hightstown: c/o pres.*
Hopewell Borough: c/o pres.*
Hopewell Twp.: c/o pres.*
Lawrence Twp.: c/o pres.*
Borough of Pennington: c/o pres.*
Princeton: c/o pres.*
Robbinsville Twp.: c/o pres.*
City of Trenton: c/o pres.*
West Windsor Twp.: c/o pres.*

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Members of Councils/ Boards of Supervisors (PA):

Langhorne Borough Council: c/o pres.*
Lower Makefield Twp. Board of Supervisors (BOS): Grenier*, Weiss (chair)*, Lewis*, Blundi*, McCartney*
Middletown Twp. BOS: c/o chair*
Morrisville Borough Council: c/o pres.*
Newtown Borough Council: c/o pres.*
Newtown Twp. BOS: Calabro (chair)*, Oxley, Mack, Davis, Fisher
Upper Makefield Twp. BOS: c/o chair*
Yardley Borough Council: c/o Bria (pres.)*
Falls Twp. BOS: c/o chair*

Sue Simon
Kyle Melander
Rose Wuenschel
Shannon Sticker
Dan Fagan
Ryan Bevitz
Ruth Foster (Director; NJ DEP, Office of Permit Coordination & Environmental Review)*
Barry Seymour; Executive Director, DVRPC*
DVRPC Board members
John Ward, DVRPC Deputy Executive Director*
Patty Elkis, DVRPC Director of Planning*
Evan Stone; Executive Director, Bucks County Planning Commission*
Lower Makefield Township (LMT) Manager, Kurt Ferguson*
LMT Solicitor, David Truelove*
LMT Trenton-Mercer Airport Review Panel
Bucks Residents for Responsible Airport Management (c/o President, Holly Bussey)
Trenton Threatened Skies
Mercer Quiet Skies
Residents for Regional Traffic Solutions, Inc.
William Penn Foundation*
Water Resources Association of the Delaware River Basin*
Partnership for the Delaware Estuary*
Buxmont Coalition for Safer Water*
Delaware River Keepers
Delaware/Raritan Canal Commission
Pennsylvania Canal Society
Canal Society of New Jersey
NJ Sierra Club
PA Sierra Club
Clean Air Council (Philadelphia, PA)
NJ Audubon Society
Bucks County Audubon Society
Watershed Institute*

INTRODUCTION

I am writing to you as a medical doctor and concerned Mercer County resident, to outline the significant risk to public health that increased and unregulated aviation emissions have on the residents of our state. The convergence of several detrimental factors demand consideration: 1) the identification of Ultrafine Particulate Matter (UFP, diameter <100 nanometers nm) specific to aviation exhaust, 2) significant contribution of UFP to perilous and costly health conditions, 3) increased flight volume, including overflights, in a background of poor ambient air quality, 4) the lack of regulation regarding Greenhouse Gases (GHG) emitted from aviation sources. There are numerous other pollutants and issues related to aviation emissions, but I will focus on these four concerns which have been poorly considered as the Trenton Airport seeks to massively expand operations.

AIRPLANE EMISSIONS

In 2014, a groundbreaking study using mobile air quality monitors demonstrated that particulate matter from airplane emissions spread 10 miles outside of the flight path.¹ This was not just for takeoff and landings, as previously presumed, but for overflights as well. Specifically, pollutants measured 4-5 fold at 6 miles downwind and persisted 2-fold at 10 miles downwind. The authors of the study concluded that air traffic exhaust was the “same general magnitude as the entire urban freeway network”² occurring overhead, raining down on residents. Their findings “indicated that the air quality impact areas of major airports may have been seriously underestimated”.³

Until recently, studies regarding Traffic Related Air Pollution (TRAP) and Particulate Matter (PM 2.5, diameter <2.5 micrometers (µm), did not specifically address smaller Ultrafine Particles (UFP, diameter <100 nanometers nm) or the specific contribution of aviation-origin emissions.⁴ The highly significant Mov-Up Study, published in December 2019, utilized mobile air sensors to specifically delineate road vehicle exhaust from airplane emissions.⁵ The researchers were able to identify a fingerprint of UFP specifically emitted by planes. The Mov-Up researchers found that the size and velocity with which aviation UFPs are thrust from jet engines, allows for much further spread than heavier ground vehicle emissions, which fall to the surface a relatively short distance from roadways. Additionally, the velocity with which UFPs travel prevents adherence to other particles, allowing the UFPs to reach the earth unchanged in size. The significance of UFP’s <100 nm size is demonstrated in UFP’s ability to permeate

human tissue barriers far more efficiently than other PM; emerging studies correlate UFP with significant tissue inflammation, injury and risk, as outlined in the health section below.

Related studies have shown that the size and velocity of aviation-emitted UFPs allow for concentration indoors,⁶ and the concentrations in homes of aviation-origin UFP and NO₂ were comparable to or exceeded near-road regulatory monitors.⁷ This same report also demonstrated the inadequacy of stationary air quality monitors to accurately estimate residential exposures. Stationary air quality monitors are currently utilized in New Jersey.

The exact composition of aviation-emitted UFP will be further delineated in the ongoing Mov-Up Part 2: "The Characterization of Urban Nanoparticles".⁸ There is concern that aviation related UFPs contain heavy metals, as demonstrated by a study examining soil contamination surrounding the international airport in Delhi, India.⁹ Of additional concern is the recent report of aviation-originated emission organophosphates in the water, soil and vegetation surrounding airports.¹⁰

PUBLIC HEALTH

As a medical doctor, I am overwhelmed and alarmed by mounting environmental toxicology data implicating serious harm related to airplane emissions. We have known for a long time about the significant harms to human health of poor ambient air quality. Extensive correlations have been demonstrated in diverse illnesses, impacting all segments of the population. Air quality related illnesses include cancer,¹¹ asthma and non-smoking COPD,¹² Heart Attacks,¹³ poor cognition,¹⁴ Sudden Infant Death Syndrome (SIDS),¹⁵ Neonatal ICU admissions and Preterm delivery.¹⁶

Recent data linking TRAP to Pregnancy related complications such as Preeclampsia and Gestational Hypertension, is particularly alarming given the Maternal Mortality crisis occurring nationwide.¹⁷ A well-designed study documented airport delays and taxiing time to an increased incidence of hospitalizations for asthma and heart attacks.¹⁸

Data is now emerging regarding the specific risk of UFPs. UFPs cause unique risk to health because their small size allows passage across tissue barriers, including the difficult to permeate blood-brain barrier. Recent NIH studies have demonstrated UFP exposure related brain tumors,¹⁹ asthma,²⁰ heart attacks, mental health issues, including teen ER visits for anxiety and suicidal ideation,²¹ and various pregnancy complications, specifically preterm birth.²² Babies and

children may be particularly susceptible because they accumulate UFPs at higher relative concentrations than adults.²³

Recent COVID-19 related public health trends, specifically decreased preterm birth²⁴ and increased COVID-19 mortality for residents in areas of poor air quality,²⁵ are two tangible examples of the real-time consequences of air quality. It is imperative that we quantify the emissions pollutant volume and dispersal patterns with regard to public health and environmental injustice.

FLIGHT VOLUME

New Jersey residents' risk from aviation-emission toxicity are compounded because of our poor ambient air quality, our population density and our location. We are the unfortunate recipients of massive pass-through vehicular²⁶ and aviation overflight exhaust. Our location along the northeast corridor makes us specifically susceptible to exhaust generated by residents of other states passing through and flying over en route to out of state destinations. The burden of our impact was increased with the FAA's 2007 tristate metropolitan area airspace redesign²⁷ which sought to streamline routes into condensed sky highways: *"Each layer includes a finite piece of airspace defined by lower and upper altitude limits and defined geographic boundaries"*. The Redesign, by delineating specific, narrowed lanes of travel, allows for increased volume and additional flight routes: *"new departure gates and arrival posts would permit the development of new routes in the airspace structure. Expanding the boundaries of the terminal airspace environment would permit less restrictive separation rules to be used in a larger volume of airspace"*. The net impact of the redesign was not only to increase flight volume to/from New Jersey, but also to dramatically increase overflights.²⁸ The resultant expansion of air traffic over the past decade, prior to the COVID-19 pandemic, has contributed to New Jersey's poor air quality and public health issues.

The NY-NJ-PHL Airspace redesign established the local framework for the FAA's NextGen system, which transitions airspace to satellite-based navigation nationwide.²⁹ The FAA is unapologetic in their goal of drastically increasing flight volume. As James Eck, the Assistant Administrator for NextGen commented: "overarching objectives for the future remain the same — maximizing airspace capacity with more sophisticated and seamlessly integrated information about the future position of aircraft at a given time". NextGen has already been implemented at major US airports, with a phased approach for nationwide integration by 2025. NextGen uses satellite guided positioning to reduce mandatory distances, including vertical distances, between

planes and to expand multiple runway operations. Thus, airport operations can be drastically increased. While this has been skillfully accomplished in the name of “aviation safety” and efficiency, the FAA’s description of NextGen as “*a collaborative effort between the FAA and the aviation community*” underscores the fact that the FAA has not considered the safety, health or air quality of citizens on the ground. In fact, the FAA’s primer on aviation emissions, impacts and mitigation maintains “Aviation’s contribution to a region’s air emissions inventory is generally small”.³⁰ Because aviation emissions have been both minimally studied and minimally regulated, residents are being crop-dusted with invisible turbine exhaust and dangerous pollutants, the health impacts of which are only now being recognized.

CLIMATE

Aviation’s contribution to greenhouse gases is unregulated. Thus, the alarming speed at which aviation negatively impacts climate change has also been unrecognized.³¹ Although the EPA ruled in 2016 that "Greenhouse Gas Emissions From Aircraft Cause or Contribute to Air Pollution That May Reasonably Be Anticipated To Endanger Public Health and Welfare" no regulations were proposed.³² Only recently have Aviation related GHG Emission Standards for Aircraft been proposed.³³

The following assessment in the TTN Airport Runway Protection Zone Environmental Assessment emphasizes the veracity and magnitude of this issue:

1.4.2 Greenhouse Gas Pollutants: Since there are no federal or state standards for aviation-related GHG, there is no significant impact threshold for GHGs.”³⁴.

The same report includes 5 pages detailing *construction* vehicle emissions and duration of use during the Runway Protection Zone obstacle clearance, yet there is no analysis of anticipated emissions after completion of RPZ and other related Master Plan projects (new 4x current capacity passenger terminal, new corporate terminal, Flightserv terminal, redesigned taxiways for increased efficiency and flight operations). Projected airport operations used in the analysis are extremely underestimated: total operations calculations for 2035³⁵ had already been surpassed by 2019.³⁶ One would anticipate increased on-ground facility operations, increased passenger car volume, and significantly increased flight operations after the airport has realized its master plan³⁷ expansion and is working at full capacity. The report distracts from the continued impact that TTN will have on the local environment and climate change by extensively reviewing construction equipment during the finite, short-term obstacle clearance of the RPZ. The long-term, ongoing impact of the finished cumulative master plan projects, which

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promise and threaten to be utilized at increasing capacities for decades to come, remains *unexamined*.

The disregard for air quality impacts was demonstrated with the onset of the coronavirus pandemic when major commercial airlines flew nearly empty so as to not lose their preferred scheduled slots.³⁸ The FAA promoted this practice, without regard for the impact on the environment and without promoting coordination and efficiency between airlines. Thus, airlines received billions in CARES grant bailout money without any incentives to reduce their environmental impact.

The complex interaction between climate and pollution is a self-perpetuating and escalating relationship. As some in the federal government have taken a pro-industry stance by withdrawing from the Paris Accord and stripping away the basic tenets of the Clean Air Act, it is up to politicians and government agencies at the state level to continue to be responsible. I appreciate the leadership Governor Murphy has taken with his Climate Bill, Executive Order No. 100. While air travel will recover over the next decade, it is imperative that we proceed as deliberately as possible with regard to the balance between the benefits of travel and our commitment to preserving our environment.

Thank you for your consideration,

Debra Baseman, MD
5 Van Kirk Road
Princeton, NJ 08540

Citations:

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R.R.T.S.
Residents for Regional Traffic Solutions, Inc.
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New Jersey Clean Air Council Public Hearing held on July 30, 2020:
RE: Past, Present, and Future: Air Quality Around Our Ports and Airports

ORAL TESTIMONY SUBMISSION: July 30, 2020 # Pages: 2

I am Susan Herman, President of Residents for Regional Traffic Solutions, Inc. (a.k.a. RRTS), P.O. Box 285, Newtown, PA 18940.*

Our comments are about Trenton-Mercer Airport (a.k.a. TTN). Our organization, along with BRRAM (Bucks Residents for Responsible Airport Management) and Mercer County -based grassroots groups, has been concerned with the expansion of TTN for over 20-plus years. TTN expanded “under the radar” throughout the past 20-plus years, by approving & implementing numerous individual projects, whose whole equaled large-scale expansion. By dividing the expansion into “segments”, TTN has avoided having to do the Cumulative & Expansive Environmental Impact Statement (EIS) that would measure its **true negative impacts** on all affected Mercer County (NJ) and Bucks County (PA) municipalities.

Recently, residents are increasingly alarmed about the large number of projects that TTN has sought approvals for, without regard to **cumulative impact** on the environment, surrounding New Jersey & Pennsylvania communities, and public health. There are at least twenty-five (25) in-process individual projects that we can list that have either been approved, are in the process of seeking approval, or are planned in the near future as “unrelated” or “independent” improvements.

*Residents for Regional Traffic Solutions, Inc. (RRTS) is a non-profit organization founded in August, 2001. Its purpose is to engage in public awareness as to traffic issues in the Central Bucks County area. RRTS focuses on issues related to transportation, infrastructure and the impact of transportation-related decisions on regional populations. In the case of Trenton-Mercer Airport, the impacted regional populations are in Mercer County, New Jersey and Bucks County, Pennsylvania.

All of these segmented, individually- considered projects are **outlined and proven to be related & interdependent in the Master Plan of 2018**. The Mercer County Website describes the Master Plan as such: *“the Airport Master Plan is essentially a facility planning study that sets forth a conceptual framework for possible future airport development”*. The **Airport Layout Plan (ALP)**, part of the Master Plan, clearly identifies a proposed terminal expansion, the runway protection zone, and development of Parcel A of the Naval Air Warfare Center where there are known PFOS, VOC’s, mercury and other contaminants.

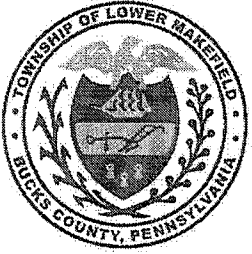
The residents who have been, and will continue to be, hardest hit by the airport’s success in skirting around doing a Cumulative & Expansive EIS [of all affected New Jersey and Pennsylvania municipalities], are those residing in Ewing Township and the City of Trenton. In Dr. Nicky Sheats’ earlier presentation, he described the vulnerability of communities such as these and our obligation to study cumulative impacts and practice Environmental Justice & Social Justice.

It is unconscionable that New Jersey politicians - from the local up through the Federal level - ignored RRTS’s September 30, 2019 letter which stated that residents are worried that the continued reckless, unchecked expansion of TTN will cause irreparable harm to our health, safety and welfare. The harm will include, but not be limited to, potential PFOS contamination of our water supply.*

Today, presenters have talked about the health impacts of air pollution around our ports and airports. Researchers are equating unregulated airplane exhaust to an urban freeway network & are warning that the air quality impacts have been seriously underestimated. PFOS contamination of drinking water is linked to harming children’s neurological development, kidney cancer, and testicular cancer. The health impacts of the coronavirus - combined with those caused by air pollution and contaminated drinking water - will be devastating.

We implore the New Jersey Clean Air Council to vigorously oppose the expansion plans of the Trenton-Mercer Airport (including all individually-considered projects) that will potentially increase air and water pollution in New Jersey and Pennsylvania.

* RRTS’s September 30, 2019 letter will be included in our written testimony, along with a written version of this oral testimony. The subject of our September 30, 2019 letter is **RE: IMMINENT PROPOSED EXPANSION OF TRENTON-MERCER AIRPORT (TTN): New Jersey & Pennsylvania residents living in municipalities surrounding TTN, worry that it will cause irreparable harm to their health, safety & welfare. The harm is likely to include, but not be limited to, irreparable damage to the water supply.**



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Township of Lower Makefield

BOARD OF SUPERVISORS
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August 10, 2020

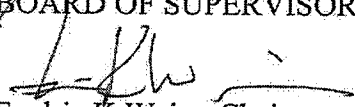
PA Department of Environmental Protection

RE: Public comment for the 2020 Pennsylvania Integrated Water Quality
Monitoring and Assessment Report

The Lower Makefield Township Board of Supervisors would like to bring to the attention of the PA DEP our community's water pollution concerns for the Delaware River regarding \$177M of planned development projects at the Trenton-Mercer Airport in New Jersey. The projects are aimed at significantly expanding air traffic capacity at the airport and they have not been given an adequate environmental review regarding ground water run-off, additional contaminants introduced through airport operations and air pollution, and the impact of construction projects on known locations of PFOS/PFOA contaminants. The details are presented in this letter dated November 12, 2019 from Congressman Brian Fitzpatrick to the Secretary of US Department of Transportation, Elaine L. Chao. One of the key problems is that the FAA and airport authorities assert that all of these projects are disconnected and they do not recognize the cumulative impact that these projects will have on the local community in terms of noise, quality of life and air and water pollution. We request that you ascertain what impact the TTN Airport Master plan projects will have on the safety and quality of drinking water for PA residents. We also ask that the PA DEP engage with the NJ DEP regarding their assessments and that you request NJ DEP prepare a full environmental impact statement for the collection of planned projects.

Very truly yours,

LOWER MAKEFIELD TOWNSHIP
BOARD OF SUPERVISORS


Fredric K. Weiss, Chair

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BRIAN K. FITZPATRICK
1ST DISTRICT, PENNSYLVANIA

COMMITTEE ON FOREIGN AFFAIRS

COMMISSION ON SECURITY AND
COOPERATION IN EUROPE

COMMITTEE ON TRANSPORTATION
AND INFRASTRUCTURE



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Congress of the United States

House of Representatives

Washington, DC 20515

November 12, 2019

Elaine L. Chao
U.S. Department of Transportation
1200 New Jersey Ave SE
Washington, DC 20590

Dear Secretary Chao,

I am writing today in response to the letter I received from the Federal Aviation Administration dated August 6, 2019 regarding Trenton-Mercer Airport (TTN). In the letter, Acting Administrator Daniel K. Elwell indicated that the FAA has reviewed the projects at TTN and believes that the airport has not engaged in segmentation and has properly evaluated cumulative impacts. As stated in my letter addressed to the U.S. Department of Transportation dated May 9, 2019, I continue to be concerned that TTN has chosen to segment these projects to reduce the level of environmental study required. Additionally, I am greatly concerned that the TTN has overlooked potential existing ground water contamination while conducting their Environmental Assessment (EA). Therefore, I am requesting that the FAA review the mechanisms used by TTN to complete their Environmental Assessment to ensure that all environmental impacts, including threats to the safety of ground and drinking water, be evaluated.

The FAA, following the NEPA process, issued a FONSI/ROD for the TTN Runway Protection Zone and Obstruction Mitigation project after evaluating the Environmental Assessment. The TTN EA indicates that the proposed project will result in the clearing of 2.3 acres of trees within 100 feet of contaminated groundwater associated with the Naval Air Warfare Center (C&S Companies Environmental Assessment for Runway Protection Zones and Obstruction Mitigation page 3-24, July 2019). Although several contaminants are listed in the EA, there is no mention of the presence of PFOS/PFOA. However, according to a 2018 Congressional Brief by Maureen Sullivan, Deputy Assistant Secretary of Defense, the DoD monitored groundwater wells around the Naval Air Warfare Center Trenton and found that the majority tested near above the EPA LHA for PFOS/PFOA. Of the 38 wells tested, 23 tested above the EPA LHA with readings in the range of 178 – 27,800 PPT. (FY18 HASC on PFOS-PFOA, page 36) Considering the proximity of the wells to TTN, and how quickly PFOS/PFOA contaminations bioaccumulate, it is likely that the contaminants have spread to neighboring wells and ground water. Given the health risks associated with PFOS/PFOA exposure, it is critical that the environmental assessment for any project at TTN take these risks into account.

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It is my understanding that the spirit of the NEPA process is to ensure that project impacts are reviewed in their totality to ensure that proper environmental protections are maintained. I share the concern of my constituents that the TTN master plan and RPZ project impact studies are not in keeping with the spirit of NEPA. I urge the TTN management, their consultants and the FAA to consider cumulative impacts of not only connected actions at the airport property, but also those off-airport factors that may impact the surrounding communities.

I appreciate your attention to this matter and look forward to hearing from you.

Sincerely,



Brian Fitzpatrick
Member of Congress

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BRRAM

25 S. Main St # 208

Yardley, PA 19067

bucks residents for responsible airport management

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11 August 2020

TO: Pennsylvania Department of Environmental Protection (PA DEP)

RE: 2020 Water Quality Monitoring and Assessment Report-PUBLIC COMMENT

In response to the Water Quality Monitoring and Assessment Report, the Bucks Residents for Responsible Airport Management (BRRAM)** would like to comment on this assessment.

The public has been made aware of dangerous chemicals contaminating the water supply around the Willow Grove Naval Air base. PFAS, are now making headlines in Bucks as studies are being done to determine the impact on our health. PFAS in your blood stays forever and even minute amounts impact health, including increased cancer risk, infertility, and issues surrounding growth and learning in children. In a recent Philadelphia Inquirer article ([click here](#)), this issue is explained.

The PA DEP should be aware that PFAS has been found in the soil at Trenton Mercer Airport (TTN) in Ewing, New Jersey—*less than 4 miles* from the Delaware River. This Airport is adjacent to surrounding wetlands and then the Delaware River – a major water supply intake.

BRRAM has begun circulating a petition. Within the 7 days, we've received over 250 signatures expressing concern about the impact TTN will have on our water quality. The signatures accumulate daily:

Whereas,

the Pennsylvania Department of Environmental Protection 2020 Water Quality Monitoring and Assessment Report highlights the importance of clean water to Pennsylvania citizens along with its extensive restoration efforts and seeks public comment by Aug 11, 2020,

the former Naval Air Warfare Center site in West Trenton, NJ is known to have groundwater polluted with PFAS (poly and perfluoroalkyl substances) and other toxic chemicals,

the expansion plans of the Trenton Mercer airport (TTN) will increase the water runoff through the former Naval Air Warfare Center site and into the Delaware River, which is the drinking water supply for thousands of Bucks County (PA) and Mercer County (NJ) residents,

proactively avoiding dangerous water pollution is in the best interests of the health, environment and community of Bucks County (PA) and Mercer County (NJ) citizens;

And Whereas,

1/2

The Trenton Mercer Airport continues to move forward with plans to expand the airport 57/68 substantially with no regard for the water, air, wildlife, other environment impacts or its citizens in the surrounding region;

the undersigned concerned citizens hereby request and petition that

the Pennsylvania Department of Environmental Protection should vigorously oppose the expansion plans of the Trenton Mercer Airport (TTN) that will potentially increase water pollution in the state

the Delaware Valley Regional Planning Commission (DVRPC) should re-examine its plans and re-prioritize the importance of clean water to the region as a one of the primary goals

the Trenton Mercer Airport should conduct a full and comprehensive Environmental Impact Statement (EIS) to assess the cumulative effect of its expansion over the last twenty years and its future expansion plans, particularly considering the impact of PFAS pollutants on the Delaware River drinking water supply

the Mercer County (NJ) Board of Freeholders should immediately halt ALL expansion plans for the Trenton-Mercer Airport until a cumulative Environmental Impact Statement is completed that truly measures the negative impacts to all affected Pennsylvania and New Jersey municipalities, with a full public review

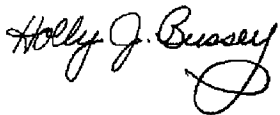
elected officials at every level of local and state government in Pennsylvania should vigorously use all means at their disposal demand that Mercer County (NJ) officials halt the airport expansion.

We urge the PA DEP to oppose the current proposed unchecked expansion plans of the Trenton Mercer Airport (TTN), outlined in the Master Plan 2018 without proper studies.(EIS)

These expansion plans will result in toxic air & water pollution that will cause irreparable harm to affected residents Bucks County, PA.

Thank you for your kind attention.

Sincerely,



Holly J Bussey, President

*****Bucks Residents for Responsible Airport Management (BRRAM) is a non-profit volunteer organization comprised of over 1,000 concerned citizens. BRRAM works with other organizations in both Pennsylvania and New Jersey, as an advocate for our residents, to help demand accountability from TTN and that TTN be a "good neighbor" respecting the environmental health, safety and well-being of all its neighbors.***

R.R.T.S.
Residents for Regional Traffic Solutions, Inc.
PO Box 285
Newtown, PA 18940
rrtsbucks5@gmail.com

**Pennsylvania Department of Environmental Protection (PA DEP):
2020 Water Quality Monitoring and Assessment Report**

WRITTEN COMMENT SUBMISSION (via email)

Aug. 10, 2020 # Pages: 11-page cover letter

Attachments: 6

BEFORE IT IS TOO LATE: OUR "ASKS" OF THE PA DEP

1.) We implore the PA DEP to vigorously & formally oppose all current and proposed expansion plans of Trenton-Mercer Airport (TTN), including the **Master Plan of 2018** that calls for:

- ...building a Passenger Terminal that is five (5) times the size of the current terminal
- ...the **Runway Protection Zone & Obstruction Mitigation Project**
- twenty-five (25) individually-considered, segmented-out projects

These expansion plans will result in toxic air & water pollution that will cause irreparable harm to affected residents in Mercer County, NJ and Bucks County, PA.

TTN continues to recklessly move forward with plans to expand the airport substantially, with no regard for the water, air, wildlife, other environment impacts on its citizens in the surrounding region. The former Naval Air Warfare Center in West Trenton, NJ (NAWC) is known to have groundwater polluted with PFAS* and other toxic chemicals. TTN's expansion plans will increase the water run-off through the former NAWC site and into the Delaware River, which is the drinking water supply for thousands of Mercer Co. (NJ) and Bucks County (PA) citizens. **PFAS contamination of drinking water is linked to harming children's neurological development, kidney cancer and testicular cancer.**

** PFAS- per-and polyfluoroalkyl substances – are a class of man-made chemical compounds used in producing products such as non-stick cookware coatings, fire retardant furniture, and foam used in firefighting. PFOA, once used to make Teflon, and PFOS, once used in Scotchgard, are among the most widely known, yet there are hundreds more still being used in manufacturing.*

2.) We also implore the PA DEP to develop an actionable response to meaningfully address the toxic air & water pollution that *ALREADY EXISTS TODAY*. TTN has *already* experienced large-scale expansion over the past 20 years, while skirting around having to do a Cumulative & Expansive Environmental Impact Statement (EIS) to measure the **cumulative impacts** on affected Mercer and Bucks County municipalities. The airport avoided having to do the EIS by breaking expansion into smaller projects, so that they were only subjected to narrow, isolated Environmental Assessments (EAs). This is segmentation, this is disingenuous, and this *already* threatens the health, safety & welfare of affected NJ and PA citizens.

SUMMARY

Residents in Mercer County (NJ) & Bucks County (PA) ask you to vigorously & formally oppose TTN's current & proposed expansion plans because...

1.) ...the airport's continued reckless, unchecked expansion will harm them & their families, as explained in the VIDEO at below link:

<https://www.youtube.com/watch?v=ZHU7m1Rzvyw&feature=youtu.be>

2.)...Health

- Airport plans will change storm drainage; there is known PFAS & other toxic chemical contamination of groundwater on airport property & the NAWC site, which could make TTN the next Flint, Michigan. PFAS contamination of drinking water is linked with harming children's neurological development, kidney cancer and testicular cancer. (See attached Philadelphia Inquirer article titled *PFAS testing planned for 2 counties: Adults and children from Bucks and Montco are being sought for a national study on the chemicals.*)
- U.S. Senators Bob Menendez (NJ) & Bob Casey (PA) are amongst 19 senators who want the U.S. government to find out if exposure to PFAS chemicals can make people more vulnerable to coronavirus.
- The particles in airplane exhaust are directly tied to heart disease and asthma. The dangerous, invisible, microscopic exhaust particles travel up to ten (10) miles outside the flight path. Even if residents cannot see the planes, they are at risk.
- Eat Locally? Thousands of residents depend on fresh fruits, vegetables & meats grown in Lawrence & Hopewell Townships. Heavy metals & organic compounds in airplane exhaust put our food at risk of contamination.
- There is a wealth of data about the negative impact of noise on learning, which is compounded by both vibration and by exhaust, as well as noise on hearing loss, particularly in children.

Environment

- Researchers are equating unregulated airplane exhaust to an urban freeway network & are warning that the air quality impacts have been seriously underestimated.
- Toxic emissions from planes flying below 900 feet endanger joggers, cyclists, and wildlife at Mercer Meadows Park & the Pole Farm Bird Sanctuary.
- Mercer & Bucks County residents are already subject to a record number of overflights & vehicular through-traffic; local airport expansion will further degrade our poor air quality. [Mercer County (NJ) is rated "F" in Air Quality by the American Lung Association.]
- The long term effects of ongoing, increased emissions in close proximity to residential areas and watershed tributaries cannot be ignored.

Financial

- Home values are estimated to decrease up to 30% near an airport.
- Mercer County has invested ?\$\$\$ in the airport over the last 20 years. What financial benefit has accrued and/or is flowing to the county and its citizens?

Irresponsible Government

- Past & current expansion has been divided into smaller projects to avoid doing a Comprehensive & Expansive Environmental Impact Statement (EIS) that measures the ***cumulative impacts*** on **ALL** affected NJ and PA municipalities.
- The residents who have been, and will continue to be, hardest hit by the airport's success in skirting around doing the EIS, are those residing in Ewing Township (NJ) and the City of Trenton (NJ). Environmental Justice & Social Justice are not being practiced.
- There has been (a) a history of blatant disregard for authentically including the public in the decision-making process for airport projects, (b) an unconscionable lack of transparency and (c) an **intentional neglect** on the part of New Jersey politicians & the airport to do whatever it takes to protect the health, safety & welfare of affected NJ and PA citizens.
- Annual flight volume through early 2019 has already exceeded the 2035 flight estimates presented to the community by 17,238 take-off/landings, 16 YEARS EARLY & PRIOR TO TERMINAL EXPANSION
- Mercer County Freeholders just authorized a \$54,000 contract to market the airport in the middle of a pandemic, when the future demand for air travel is completely uncertain and many airlines may go out of business
- During the unprecedented pandemic with unemployment and decreased tax revenues, why are much-needed county \$ being spent on the airport?

BACKGROUND

1.) RRTS, along with BRRAM (Bucks Residents for Responsible Airport Management) and Mercer County - based grassroots groups, has been concerned with the expansion of TTN for over 20 years. TTN expanded “under the radar” throughout the past 20 years, by approving and implementing numerous individual projects, whose whole equaled large-scale expansion. By dividing the expansion into segments, TTN has avoided having to do the Cumulative & Expansive Environmental Impact Statement (EIS) that would measure its **cumulative impacts** on ALL affected Mercer County, NJ & Bucks County, PA municipalities.

2.) Recently, residents are alarmed by the large number of projects that TTN has sought approvals for, without regard to **cumulative impact** on the environment, surrounding NJ & PA communities, and public health. There are at least twenty-five (25) in-process individual projects that we can list that have either been approved, are in the process of seeking approval, or are planned in the near future as “unrelated” or “independent” improvements.

All of these segmented, individually- considered projects are *outlined and proven to be related & interdependent in the Master Plan of 2018*. The Mercer County Website describes the Master Plan as such: “*the Airport Master Plan is essentially a facility planning study that sets forth a conceptual framework for possible future airport development*”. The **Airport Layout Plan (ALP)**, part of the Master Plan, clearly identifies a proposed terminal expansion, the **Runway Protection Zone & Obstruction Mitigation Project (RPZ Project)**, and development of Parcel A of the Naval Air Warfare Center (NAWC) where there are known PFOS, VOCs, mercury and other contaminants.

The danger of considering these projects separately was demonstrated at the Mercer County Freeholder Board Webex meeting on 4/23/20 when the development of Parcel A of the NAWC was discussed. Airport attorney, Mr. Markind, referred to the remediation barrier on Parcel A as being “in total disrepair” several times. There are known PFOS, VOCs, mercury and other contaminants on Parcel A and the adjacent Parcel B. Both groundwater and surface water contamination have been reported. While Parcel B continues to be managed by the Navy, it appears that Parcel A is going to be cleaned up privately as part of the Flightserv lease agreement. It was not clear, and the Freeholders did not seem to know, who was overseeing & responsible for the project.

Residents are concerned that the **Parcel A FONSI** indicates that there is “no impact, due to no changes in storm water run-off”, ignoring the fact that the adjacent, massive **RPZ Project** changes are anticipated to affect storm run off by nearly 1.5 million (1, 500,000) gallons/year, as estimated by the Watershed Institute during the public comments portion of the **Environmental Assessment for the RPZ Project** (pg. P-200-202). This estimate relates only to **RPZ Project –associated** changes to landscape, and did not account for climate-change related increases in precipitation or the additional massive airport build-out, as described above.

It makes sense that the Parcel A remediation barrier should be repaired. It also makes sense that its ability to withstand both **RPZ Project – caused** and climate-related increases in storm drainage, be addressed well in advance of any **RPZ Project** structure removal. This is but one example of why these projects **MUST** be considered together.

3.) The attached 11/12/19 letter from PA Congressman Brian Fitzpatrick to the U.S. Department of Transportation **RE: the RPZ Project** states,

“...I continue to be concerned that TTN has chosen to segment these projects to reduce the level of environmental study required. Additionally, I am greatly concerned that TTN has overlooked potential existing groundwater contamination while conducting their Environmental Assessment (EA). Therefore, I am requesting that the FAA review the mechanisms used by TTN to complete their Environmental Assessment to ensure that all environmental impacts, including threats to the safety of ground and drinking water be evaluated.....Although several contaminants are listed in the EA, there is no mention of the presence of PFOS/PFOA. However, according to a 2018 Congressional Brief by Maureen Sullivan, Deputy Assistant Secretary of Defense, the DoD monitored groundwater wells around the Naval Air Warfare Center Trenton and found that the majority tested near above the EPA LHA for PFOS/ PFOA...Given the health risks associated with PFOS/PFOA exposure, it is critical that the environmental assessment for any project at TTN take these risks into account...”

RRTS has provided the Mercer County Freeholders with this letter several times during Public Comment at their meetings. Despite Congressman Fitzpatrick’s repeated communications regarding his concern that segmentation has occurred (and that there has not been appropriate environmental scrutiny of TTN’s cumulative impacts), it is the Federal Aviation Administration (FAA) who **routinely** responds that segmentation has not occurred. The problem is that the FAA is like the fox guarding the hen house. The agency has demonstrated that it is driven by a self-interested agenda that DOES NOT include protecting the safety & welfare of citizens. (See attached 2/21/20 Buchalter article titled Quiet Skies Congressional Caucus Gets Brush Off from FAA.)

4.) The Mercer County Freeholders maintain that the **RPZ Project** is motivated purely by safety concerns and will not change airport operations. *This is boqus and disingenuous.* Aviation Professionals have advised that IT DOES NOTHING to change the safety margin. WHAT IT DOES is enable more operations and better fleet mixes.

In Mercer County's own EA, in Chapter 4, it states,

"The existing runway length needs to be maintained or it will result in a loss of operations and/or operational restrictions for the Airbus 320/320neo and the Gulf stream IV/V during wet and slippery runway conditions."

We experience wet and slippery conditions right now – should those planes be operating from this airport now? If the Mercer Co. Freeholders truly thought that this project was purely for safety concerns (which they learned about in March 2015), they would be curtailing those operations right now. It is blatantly obvious that a key purpose for this project is to effectively lengthen the runway so that TTN can have the big jets safely fly in all conditions, move lower flying & heavily laden planes, and significantly increase airport operations.

5.) More than eighteen (18) months ago, TTN promised that there would be a Public Meeting held in Bucks County, PA for New Jersey & Pennsylvania residents to review the EA and the status of the multiple current & planned projects associated with the **Master Plan of 2018**. Recently, BRRAM formally gave public comment at a Mercer County Freeholder meeting to request that the meeting be held. BRRAM also sent a formal letter to Freeholder Chairman, Andrew Koontz, requesting same. Below is the 8/3/20 email response that BRRAM received from Chairman Koontz & Mercer Co. Administrator Lillian Nazzaro:

"We forwarded your communication to the County Administrator. Please see their response below.

LAURENTI, Mario

Confidential Aide to Freeholder Andrew Koontz

From: Nazzaro L. Lillian, Esq. <lnazzaro@mercercounty.org>

Sent: Monday, August 3, 2020 9:28 AM

To: Koontz, Andrew <akoontz@mercercounty.org>

Subject: RE: Mercer Freeholders Public Comment July 16 follow up - Request for Virtual Meeting on Trenton Mercer Airport

Chairman,

As previously discussed in Freeholder meetings, a public meeting will take place in Pennsylvania as soon as the EA is approved by the FAA. The County has every intention of going forward with the public meeting and residents of Pennsylvania will be advised accordingly. Finally, the meeting will most likely be a Tele Town hall meeting.

Thank you,

Lillian L. Nazzaro, Esq.
Mercer County Administrator"

This is unacceptable. It ignores the concerns of PA citizens and is not acting in good faith.

6.)At the 10/24/19 meeting of the Delaware Valley Regional Planning Commission (DVRPC) Board, RRTS gave public comment expressing the serious concerns that affected New Jersey & Pennsylvania residents have with the continued, unchecked expansion of TTN. The 11/17/19 GUEST OPINION that appeared in the local paper, THE ADVANCE OF BUCKS COUNTY, summarized our public comment. (See Guest Opinion titled *An open letter to the DVRPC on Trenton-Mercer Airport* in the attachment labeled **DVRPC-related communications**.)

In the 11/4/19 letter from Barry Seymour, DVRPC Executive Director, to Jennifer Solomon of the FAA (See 11/4/19 letter in attachment labeled **DVRPC-related communications**), it states,

"...As TTN continues to advance their improvement plans for the facility, residents of both Mercer County, NJ and neighboring Bucks County, PA have expressed concerns about potential environmental and social impacts created by any changes in facility operations. We strongly support the continued examination and consideration of these impacts and potential mitigation strategies, in accordance with the FAA guidelines..."

The DVRPC is disingenuous in its expression of concern for the health, safety & welfare of NJ and PA residents. **The following disturbing quotes are from the DVRPC's July 2014 publication titled 2040 Regional Airport System Plan (RASP), that calls for expanding TTN far beyond an appropriate-sized local airport:**

On page 32, there's a section titled "Trenton-Mercer (TTN), New Jersey" and the first sentence of the second paragraph states, *"The airport is marketing itself as an alternative to PHL [Philadelphia International Airport] and EWR [Newark's Liberty International Airport], offering less hassle".*

Page 1 is the "Executive Summary" which states this half way down the page, *"Therefore, the objectives for the 2040 RASP took these factors into account, and the following priorities were agreed upon by the RASP subcommittee: 1. Expand commercial air service capacity within the region...3. Sustain and improve infrastructure to attract more users...This report is being prepared with the support of the Federal Aviation Administration (FAA) ..."*

Page 3 states this in the first paragraph, *" 'Aviation' to most people in the region will likely be associated with Philadelphia International Airport (PHL), the 11th busiest airport in the world (in terms of aircraft operations), but the Delaware Valley is also served by two other commercial service airports, Trenton-Mercer (TTN) and Wilmington (ILG)..."*

Page 4 is “Figure 1: Regional Airport System Map”. TTN has the same icon as Philadelphia International Airport (PHL) and Wilmington (ILG).

Halfway down page 5 it states, “*One specific economic aid for the region comes with the availability of U.S. Customs and Border Protection facilities at the region’s airports. All three commercial service airports – PHL, TTN, and ILG- have these facilities.*”

On page 7, it states this in the third paragraph, “*Commercial service airports serve scheduled service airlines, corporate aviation, and in the case of ILG and TTN, some military operations.*”

The DVRPC’s plan to expand TTN into a “booming airport” (as referenced on page 43 of DVRPC’s 2014 publication titled [resilience]), is inconsistent with its stated vision on its website Home Page on 2/19/20 which stated,

“The Delaware Valley Regional Planning Commission is the federally designated Metropolitan Planning Organization for a diverse nine-county region in two states: Bucks, Chester, Delaware, Montgomery, and Philadelphia in Pennsylvania; and Burlington, Camden, Gloucester, and Mercer in New Jersey.

DVRPC’s vision for the Greater Philadelphia Region is a prosperous, innovative, equitable, resilient, and sustainable region that increases mobility choices by investing in a safe and modern transportation system; that protects and preserves our natural resources while creating healthy communities; and that fosters greater opportunities for all.”

(See attachment labeled **DVRPC-related communications: DVRPC’s Vision** on 2/19/20 website Home Page)

The DVRPC should re-examine its plans to make TTN a “booming airport” and re-prioritize the importance of clean water to the region as one of the primary goals.

7.)It is unconscionable that New Jersey politicians, from the local level up through the Federal level, ignored the attached 9/30/19 letter from RRTS titled:

RE: IMMINENT PROPOSED EXPANSION OF TRENTON-MERCER AIRPORT (TTN): New Jersey & Pennsylvania residents living in municipalities surrounding TTN, worry that it will cause irreparable harm to their health, safety & welfare. The harm is likely to include, but not be limited to, irreparable damage to the water supply.

66/68

Our 9/30/19 letter is a formal, integral part of this written comment that we are submitting. We respectfully request that Secretary McDonnell read it in its entirety. If it is a problem that it is in pdf format, note that Secretary McDonnell received a hard copy of it via FedEx (signature required).

Thank you for the opportunity to comment.

Very truly yours,



Susan Herman, President
Residents for Regional Traffic Solutions, Inc.*

**Residents for Regional Traffic Solutions, Inc. (RRTS) is a non-profit organization founded in August, 2001. Its purpose is to engage in public awareness as to traffic issues in the Central Bucks County area. RRTS focuses on issues related to transportation, infrastructure and the impact of transportation-related decisions on regional populations. In the case of Trenton-Mercer Airport, the impacted regional populations are in Mercer County, NJ & Bucks County, PA.*

Attachments:

- RRTS Written Comment letter: PA DEP 2020 Water Quality Report
- 7/13/20 Philadelphia Inquirer article: PFAS testing planned for 2 counties
- 11/12/19 letter from PA Congressman Fitzpatrick to U.S. DOT
- 2/21/20 Buchalter article: Quiet Skies Congressional Caucus Gets Brush Off from FAA
- DVRPC-related communications: 11/17/19 Guest Opinion in THE ADVANCE, 11/4/19 letter from DVRPC to FAA, DVRPC's Vision on 2/19/20 website Home Page
- 9/30/19 letter from Residents for Regional Traffic Solutions, Inc. (RRTS)
**RE: IMMINENT PROPOSED EXPANSION OF TRENTON-MERCER AIRPORT (TTN):
New Jersey & Pennsylvania residents living in municipalities surrounding TTN, worry that it will cause irreparable harm to their health, safety & welfare. The harm is likely to include, but not be limited to, irreparable damage to the water supply.**
- VIDEO titled Trenton Airport Expansion: Your Neighbors' Concerns (youtube link provided)

CC:*All individuals/groups will receive this via email. Those asterisked will also receive it via Certified Mail, Return Receipt.*

FEDERAL LEVEL:

- U.S. Senator Bob Casey (PA)*
- U.S. Senator Pat Toomey (PA)*
- Congressman Brian Fitzpatrick (PA)*
- U.S. Senator Bob Menendez (NJ)*
- U.S. Senator Cory Booker (NJ)*
- Congresswoman Bonnie Watson-Coleman (12th Cong. District-NJ)*
- Congressman Tom Malinowski (7th Cong. District-NJ)*
- Congressman Chris Smith (4th Cong. District-NJ)*

Congressional Quiet Skies Caucus

STATE LEVEL:

Governor Tom Wolf (PA)*
Secretary Patrick McDonnell, PA DEP*
Secretary Leslie Richards, PA DOT*
PA Attorney General Josh Shapiro*
Senator Steve Santarsiero (PA)*
State Representative Perry Warren (PA)*
Governor Phil Murphy (NJ)*
Commissioner Catherine McCabe, NJ DEP*
Commissioner Diane Gutierrez-Scaccetti, NJ DOT*
Senator Shirley Turner (D15-NJ)*
Senator Linda Greenstein (D14-NJ)*
Senator Christopher Batemen (D16-NJ)*

COUNTY LEVEL:

Mercer County Executive Brian Hughes*
Mercer Co. Freeholders (NJ): Cimino*, Koontz (chair)*, Cannon*, Walter*, Frisby*, Colavita*, Melker*
Bucks County Commissioners (PA): Ellis-Marseglia (chair)*, Harvie* DiGirolamo*

MUNICIPAL LEVEL:

Members of Councils/ Committees in Mercer County (NJ):

East Windsor Twp.: c/o president (pres.)*
Ewing Twp.: c/o president*
Hamilton Twp.: c/o pres.*
Borough of Hightstown: c/o pres.*
Hopewell Borough: c/o pres.*
Hopewell Twp.: c/o pres.*
Lawrence Twp.: c/o pres.*
Borough of Pennington: c/o pres.*
Princeton: c/o pres.*
Robbinsville Twp.: c/o pres.*
City of Trenton: c/o pres.*
West Windsor Twp.: c/o pres.*

Members of Councils/ Boards of Supervisors (PA):

Langhorne Borough Council: c/o pres.*
Lower Makefield Twp. Board of Supervisors (BOS): Grenier*, Weiss (chair)*, Lewis*, Blundi*, McCartney*
Middletown Twp. BOS: c/o chair*
Morrisville Borough Council: c/o pres.*
Newtown Borough Council: c/o pres.*
Newtown Twp. BOS: Calabro (chair)*, Oxley, Mack, Davis, Fisher
Upper Makefield Twp. BOS: c/o chair*
Yardley Borough Council: c/o Bria (pres.)*
Falls Twp. BOS: c/o chair*

Barry Seymour; Executive Director, DVRPC*
DVRPC Board members
Evan Stone; Executive Director, Bucks County Planning Commission*
Lower Makefield Township (LMT) Manager, Kurt Ferguson*
LMT Solicitor, David Truelove*
LMT Trenton-Mercer Airport Review Panel

Bucks Residents for Responsible Airport Management (c/o President, Holly Bussey)
Trenton Threatened Skies
Mercer Quiet Skies
Residents for Regional Traffic Solutions, Inc.
Delaware River Keepers
Delaware/Raritan Canal Commission
Pennsylvania Canal Society
Canal Society of New Jersey
NJ Sierra Club
PA Sierra Club
NJ Clean Air Council
Clean Air Council (Philadelphia, PA)
NJ Audubon Society
Bucks County Audubon Society

Sue Simon

Kyle Melander

Rose Wuenschel

Shannon Sticker

Dan Fagan

Ryan Bevitz

Ruth Foster (Dir, NJ DEP Office of Permit Coordination/ Environmental Review)*

*John Ward**

*Patti Elkins**

*William Penn Foundation**

*Water Resources Assoc. of the Delaware River Basin**

*Partnership for the Delaware Estuary**

*Buxmont Coalition for Safer Water***

*Watershed Institute**



Trenton Threatened Skies, Inc.

September 29, 2020

Dear Ms. Montgomery,

The county website notification for [Proposed PFC 21-08-C-00-TTN](#) states I should direct questions to you :

Comments regarding the proposed PFC application, including agreement or disagreement with any of the proposed projects, or requests for additional information, should be addressed to Ms. Melinda Montgomery, A.A.E., Airport Manager”

I appreciate your timely response to the following important questions:

Given that **Proposed PFCs for New Taxiway D2 (PFC21-08-C-00-TTN)** are to commence collection 11/1/2021 or when prior PFC completed
AND

Current PFCs (19-06-C-00-TTN, to collect **\$3,231,139** from 12/1/2019 thru 11/1/2021) **began just 4 months prior to COVID shutdown**, please clarify the following :

- 1) What is the current residual for the \$3.2 Million to be collected via 19-06-C-00-TTN?
- 2) What is the revised completion date of the current PFCs?
- 3) What is the likely start date of proposed PFCs for **Taxiway D2 (PFC21-08-C-00-TTN)**?
- 4) If PFC funds are incompletely collected, does residual debt remain as Mercer County Bond Debt? Or other Mercer County debt?
- 5) Was [PFC 15-04-C-00-TTN](#) ending 7/1/2019 **for \$6,055,191** collected in full?
 - a) Was this payment completed in full from collected PFFs?
 - b) If not, what was the residual owed?
 - c) Did any residual debt remain as taxpayer or county bond debt ?
 - d) Was it repaid by other airport income? If so, what?
- 6) Regarding Mercer County Budget Table 39D-1, Mercer anticipates obtaining \$142M in airport related “self-liquidating bonds” for terminal replacement and parking garage.
 - a) Please clarify the specific revenue source(s) and anticipated proportion of each source for repayment of the \$142 million “self-liquidating bonds”
 - b) What is the presumed number of years it will take to repay said bonds?
 - c) What is the revised repayment prediction given anticipated prolonged recovery post COVID-19?
- 7) Airport Operating Budget
 - a) We have requested a copy of the Airport Budget and have been referred to the Mercer County website and the general County budget.
 - b) **FAA/AIP guidelines specifically state that an Operating budget must be made available to the public.**

- c) Can you kindly direct me to the operating budget. If this requires an OPRA, please specify the exact wording or name of the document so that our OPRA is not declined again.
- 8) Regarding recently approved Resolution 21: Grant Agreement **FAA (3-34-0042-054-2020) \$480,000** On-Airport Obstruction Removal Design and Permitting
 - a) What is Mercer County's responsibility?
 - b) Is it 10% (\$48K) as is typical with FAA grants?
 - c) Are there any other costs to Mercer residents regarding this grant?

Thank you very much for your prompt response to these questions. Obtaining information has been difficult and lacking transparency.

You have received these questions via USPS return-receipt and as such should be submitted to the FAA as is standard protocol during the public comment period. Many members of the public are disturbed that their voice has been suppressed, as was evidenced by the voice mail complaints that were deleted and neither recorded nor reported to the FAA for decades. This situation was only remedied within the past year, in response to our OPRA discovery and outrage. We trust that all comments will be submitted and would like FAA verification of receipt. There is significant community controversy regarding the true cost of this expansion. The public has many unanswered questions. A growing constituency questions the wisdom of proceeding with massive expansion during a time of devastating budgetary shortfalls and a significant downturn in anticipated travel; this is especially true when many Mercer residents are struggling to have their basic needs met.

Thank you in advance,

Trenton Threatened Skies on behalf of the residents of Mercer and Bucks Counties



Trenton Threatened Skies, Inc.

9/29/30

Dear Ms. Montgomery, FAA Administrators & Mercer County Officials:

Please accept our public comments regarding proposed Passenger Facility Charges (PFC).

[PFC 21-08-C-00-TTN](#) For Taxiway D2:

TTN will impose PFCs of > \$1.4 Million to reimburse the cost of building Taxiway D2. The proposed project will provide a standard **parallel taxiway** for aircraft utilizing Runway 16-34, as well as additional exit locations for aircraft landing on Runway 6-24. PFC anticipated start date of **November 1, 2021, or upon the completion of collections associated with the previous Notice of Intent (19-06-C-00-TTN)**, with an estimated charge expiration date of August 1, 2022, based on current annual enplanement projections'.

These proposed PFCs are **in addition to [CURRENT PFCs 19-06-C-00-TTN](#) of \$3.2 Million** slated for collection 12/1/2019 through 11/1/2021.

While we are not opposed to the general concept of PFC to reimburse county bonds, we are:

1. Alarmed at the continued expansion of the airport despite significant community controversy,
2. Dismayed at massive development by segmentation into smaller projects,
3. Opposed to **building full length parallel taxiways that will dramatically increase airport operations,**
4. Concerned for the environmental & public health implications that will result from expanded operations,
5. Angered regarding the **enormous debt burden TTN and Mercer County are willing to accept at a time of decreased air travel and financial crisis,**
6. Confused why county officials are not using these funds to help Mercer residents in need.

The financial concern is apparent in the qualified start date of collections ("11/2021 or upon completion of prior PFF collections"). FAA online statistics show TTN collected PFC revenues of \$1.9M in 2019 and \$1.8M in 2018, both during pre-COVID peak travel. Current PFC [19-06-C-00-TTN](#) collections are tasked with raising \$3.2 million by this time next year. Common sense indicates that this is impossible, particularly because collections began in December 2019, only 3 months before the pandemic shut down the vast majority of air travel. It is reasonable to assume the bulk of PFC [19-06-C-00-TTN](#) principal remains unpaid. Given that air travel remains minimal and that recovery is anticipated to take years, it is irresponsible to continue expansion projects and add to Mercer County's debt burden.

Undeterred by neither the dismal predictions for air travel recovery nor the unprecedented deficits in county, state and federal budgets, TTN and Mercer county officials seem perfectly willing to continue to incur debt and expand the airport. There remains a very real possibility of project incompletion as both Federal and NJ state budgets amass devastating shortfalls. Specifically consider the FAA's Airport Improvement Program (AIP), the source of many TTN grants. The AIP itself is funded by the Airport and Airway Trust Fund (AATF). The **AATF Congressional Report (R44749)** states:

"Poor economic conditions or external events could curb demand for air travel, reducing revenue from the ticket taxes that are the main source of AATF funding."

In other words, not only could revenues from PFCs decline, but funding from FAA/AIP could disappear as well.

Similarly, New Jersey is in a devastating financial situation, with the [Governor borrowing \\$4.5 Billion](#) to keep the state operating. It is entirely possible that NJDOT grants, on which TTN depends for many projects, could similarly be decreased.

All of this is in addition to massive Mercer County budgetary shortfalls. Using bonds to finance an airport expansion raises the very real possibility that AIP federal funds, NJDOT funds and TTN revenue (passenger facility & other airport fees) may remain drastically suppressed after we have assumed massive bond debt. This worse case financial scenario is an entirely realistic possibility that would likely devastate county finances for decades to come.

With regard to the project itself, Mercer Officials have disingenuously misrepresented the project. The voice of Mercer & Bucks county residents has been repeatedly suppressed. Noise complaints to the TTN hotline were erased with no record kept, officials have not answered questions and OPRA requests have been delayed or denied. Transparency is lacking. Residents' concerns are repeatedly dismissed by falsely declaring the airport is "not expanding because the number of runways remains the same". This is utter nonsense; when air travel ultimately recovers, through-put can significantly increase on the same two runways. This will certainly happen when TTN and County officials achieve their goals:

1. a 4 to 5-fold larger terminal,
2. dramatically increased screening and holding capacities,
3. an increase **from 2 gates**, (loosely interpreted as '**4 parking positions**'), **to 4 gates (also with additional parking positions)**,
4. the change to passenger boarding bridges on all 4 gates,
5. the addition of dual parallel taxiways.

As these PFCs are meant to pay for parallel taxiway development, we should be honest that the goal of such is to increase efficiency and thus through-put or operations. This is clearly stated in the FAA circular below. Additionally, to achieve this goal, segmentation into more than 25, individual, smaller, projects has occurred without the acknowledgment of the ultimate goal or impact. If the result of these smaller runway additions & renovations is dual parallel runways, the ultimate anticipated flight volume should be accurately and honestly assessed. Instead, the CATEX approval for the significant D&G connector uses a maintenance and repair exemption to avoid acknowledging the impact on local ozone, from which we suffer non-attainment status.

The CATEX for Taxiway D2, as related to proposed PFCs, is not available online, but presumably it also minimizes the full cumulative impact of these construction projects.

Please see attached screenshots below.

In closing, we reiterate our strong opposition to continued expenditures on airport expansion. Our position remains that the airport is a poor investment, both financially risky currently, and environmentally dangerous in the long-term.
Please don't ruin the Mercer County we love.

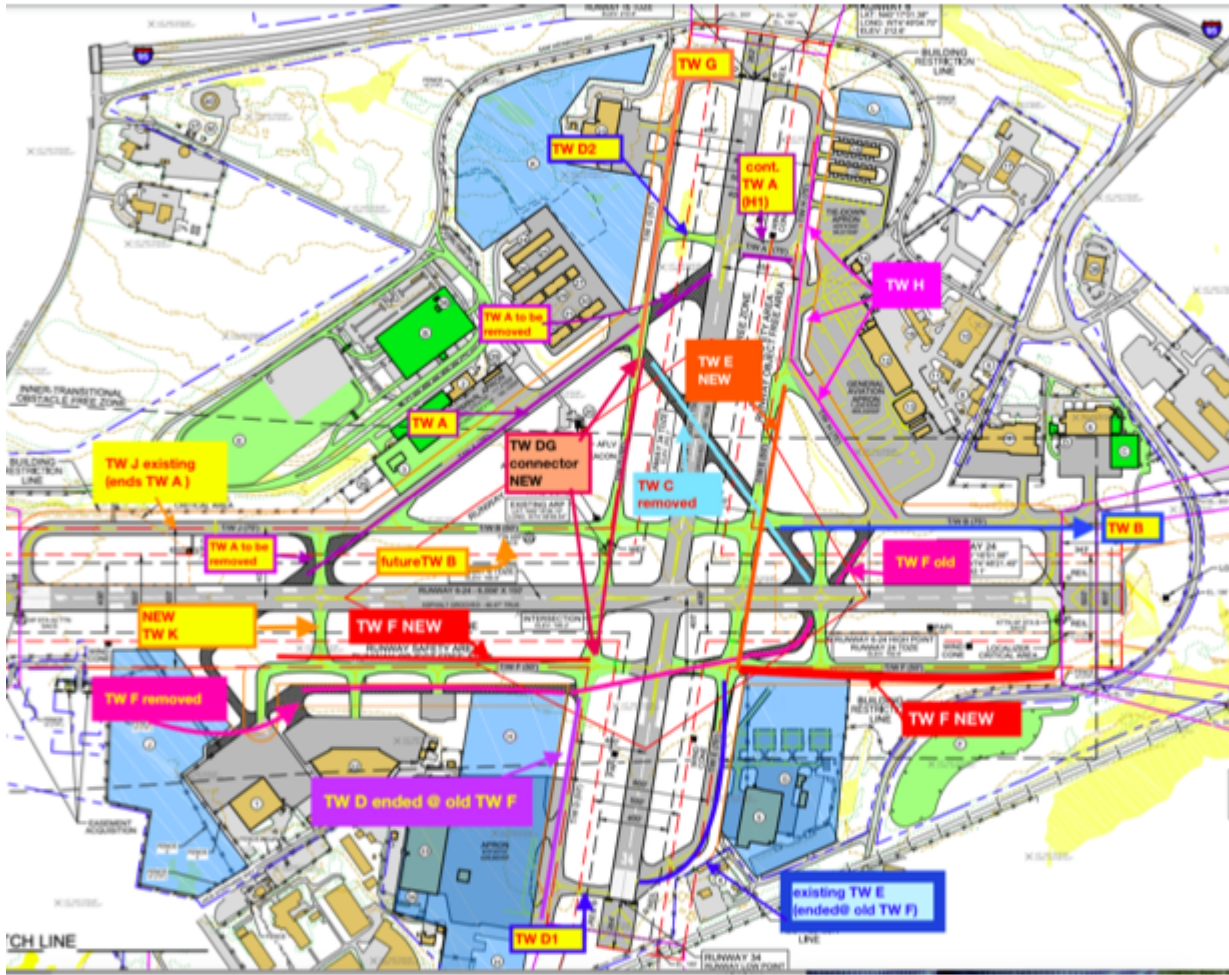
Sincerely,

Trenton Threatened Skies, Inc.
On behalf of a rapidly growing constituency of Mercer and Bucks County residents.

304g. Air Quality

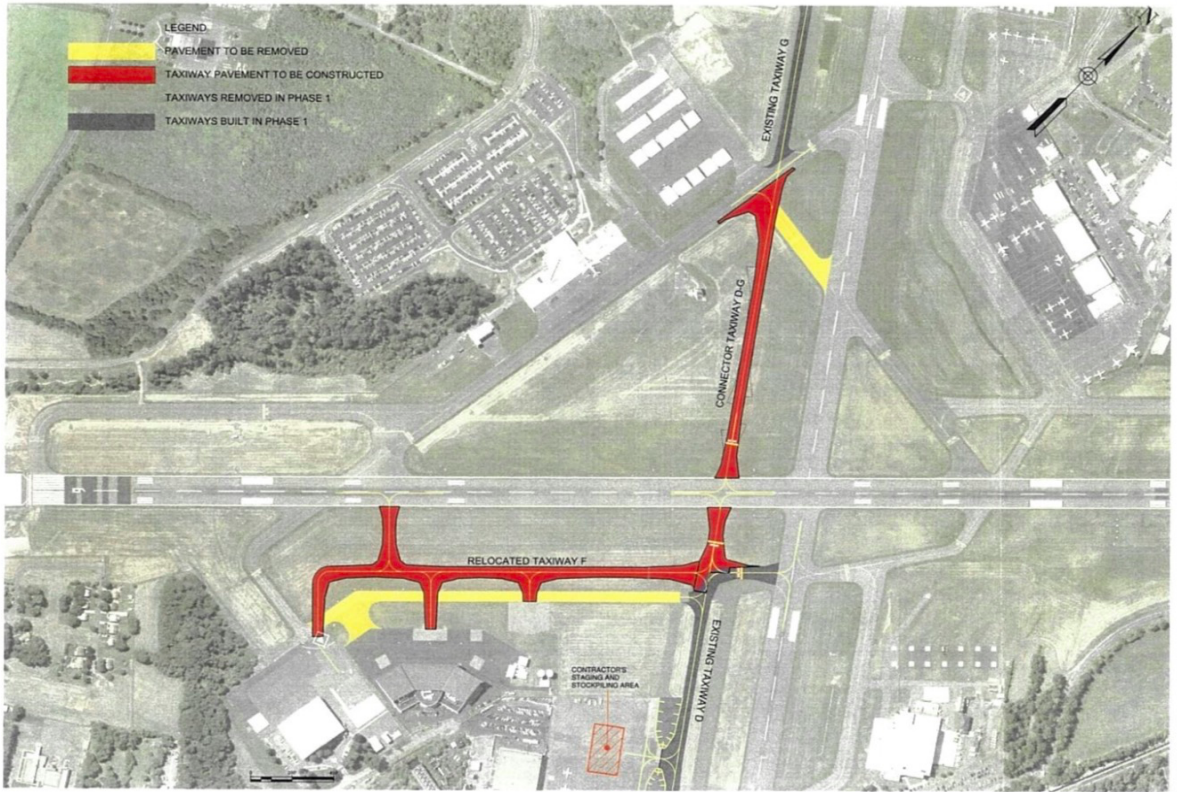
From CATEX Taxiway F
and Taxiways D&G
connector, page A13

	YES	NO
Is the project located in a Clean Air Act non-attainment or maintenance area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>If yes, is it listed as exempt, presumed to conform, or will emissions (including construction emissions) from the project be below <i>de minimis</i> levels? (Provide the paragraph citation for the exemption or presumed to conform list below, if applicable.) Is the project accounted for in the State Implementation Plan or specifically exempted? Attach documentation. If exempt or "presumed to conform", skip the next two questions.</p> <p>The proposed project area is located in a <u>nonattainment area for 8-hour ozone</u>. The Federal Aviation Administration's "Federal Presumed to Conform Actions Under General Conformity" rules FRN volume 72 No. 145 Page 41567 <u>provide an exemption for Routine Maintenance and Repair Activities</u>. This project involves the removal and replacement of a taxiway and the installation of a taxiway connector. The project will <u>not increase the capacity or change the operational environment of the airport</u>. <u>Therefore, this project falls under the Routine Maintenance and Repair Activities exemption.</u></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



405. Parallel taxiways. From FAA Airport Design Circular AC150/5300 13A item405 pg 143

A parallel taxiway eliminates using the runway for taxiing, thus increasing capacity and protecting the runway under low visibility conditions. In addition, a full length parallel taxiway is required for instrument approach procedures with visibility minimums below one mile and recommended for all other conditions. To accommodate high density traffic, airport planners should consider multiple access points to runways through the use of multiple parallel taxiways. For example, to facilitate Air Traffic Control (ATC) handling when using directional flow releases, e.g., south departure, west departure, etc., aircraft may be selectively queued on dual (or even triple) parallel taxiways. A dual parallel taxiway provides the ability for airplanes to taxi behind an airplane holding at a runway holdline. A dual parallel taxiway Figure 4-12 need not extend the full length of runway. The need for a parallel taxiway may be fulfilled by a series of taxiways generally parallel to the runway, allowing taxiing between each end of the runway without crossing the runway that they are generally parallel to, and providing an unobstructed view of the runway. See paragraphs 409.c and 409.d, interactive Table 3-5, and Table 3-6 regarding runway to taxiway separation requirements.



Scale: 1" = 100' (Horizontal)
 1" = 20' (Vertical)

TRENTON-MERCER AIRPORT
 TAXIWAY D RELOCATION
 PROJECT NO. AB2017-___
 TAXIWAY F RELOCATION
 AND THE CONNECTOR
 TAXIWAY D-G

DRAWN: KMS APPROVED:
 CHECKED: DR DATE: 10/25/2018
 DRAWING NO:

G104
 SHEET NO. 4 of 4