



C&S Engineers, Inc.
Attn: PHL West Cargo EA
1500 Market Street, Suite W2410
Philadelphia, PA 19102

(Email ONLY)

westcargoEA@phl.org

Re: Draft Environmental Assessment for Philadelphia International Airport – West Cargo Redevelopment & Expansion Plan

Good Day,

This comment is written on behalf of the Eastwick Friends and Neighbors Coalition, the Delaware Riverkeeper Network and the Darby Creek Valley Association. We appreciate the opportunity to provide input on the DRAFT Environmental Assessment for Philadelphia International Airport – West Cargo Redevelopment and Expansion Plan (Expansion Plan). We do, however, reserve the right to raise and address additional issues and concerns throughout this EA process and the required NEPA process.

The Eastwick Friends and Neighbors Coalition (EFNC) is a grass-roots, non-profit organization consisting of community residents and stakeholders advocating and striving for future development in Eastwick to be guided by 21st century values, information, and strategies. EFNC's goals include the development of an environmentally and economically healthy, just and sustainable community with an emphasis on community-based decision-making.

The Delaware Riverkeeper Network was established in 1988 and, with over 23,000 members, champions the rights of our communities to a Delaware River and tributary streams that are free-flowing, clean, healthy, and abundant with a diversity of life.

The Darby Creek Valley Association (DCVA) was founded in 1984, by residents in the Darby Creek Watershed, DCVA became a nonprofit watershed organization dedicated to the protection and enhancement of the watershed and its resources, including water, wildlife, historical sites, floodplains, wetlands, and riparian zones.

An Environmental Impact Statement (EIS) rather than an Environmental Assessment (EA)

As we stated in our prior EA Scoping comment (August 29, 2019), the undersigned believe that a full EIS must be conducted on the Expansion Plan to fully understand the cumulative impacts of this expansive project, which includes but is not limited to, increase in impervious surface, disturbance of wetland and open space, increase

DELAWARE RIVERKEEPER NETWORK
925 Canal Street, Suite 3701
Bristol, PA 19007
Office: (215) 369-1188
fax: (215) 369-1181
dm@delawareriverkeeper.org
www.delawareriverkeeper.org

noise and pollution, change in local hydrology and likely impacts on flooding and wildlife habitat. The cumulative impacts that would be documented in an EIS would reveal the impact the Expansion Plan will have on the surrounding human communities and the local and regional environment. Further, we believe that the EA has insufficiently addressed up-stream development, the impacts of sea-level rise, storm surges and other effects of Climate Change. The Expansion Plan is a multi-billion dollar project whose impact will be felt for decades.

Defined:

An EA is a concise review document taking into account the purpose and need of the proposal, any alternatives, and a brief review of the impacted environment.

An EIS is a much more comprehensive document. An EIS requires everything an EA would require while also requiring a much more comprehensive discussion of the reasonable alternatives, and a “hard look” at the cumulative impacts of the proposal along with all existing and reasonably foreseeable future development within the project area. The use of an EA rather than an EIS means that an agency is not required to assess the cumulative impacts of the proposal along with all other existing and reasonably foreseeable future development nearby. In a practical sense, EAs function as piecemeal planning due to their limited scope, while EIS’s function more as holistic, landscape-level planning.

For these reasons, we urge the Agencies and entities leading the Expansion Plan to utilize the valuable information within the EA and incorporate that into a full EIS.

Several issues do not seem to be adequately or even addressed at all in the EA and they merit further examination in an EIS. First is the set of concerns around the filling and impervious surfacing of significant acreage in the floodplain, in a highly flood prone area. The project would result in 87.2 acres of additional impervious surface. It is unclear that mitigation of the reduced floodplain storage is adequately addressed in the plan. In addition, the selection of this among the potential project sites requires the largest amount of fill for leveling. The volume needed is recognized as necessitating the use of contaminated fill, exceeding residential health-based standards (4-42). It is not clear if this concern was adequately considered in the site selection. A full EIS would potentially provide the necessary justification, as well as ensure safeguards from leaching or other escape of the contaminants during construction and operation are adequate.

A second concern is if the treatment of noise impacts, in particular aircraft noise exposure, in the EA is sufficient. The EA discusses the compatibility of the project with the John Heinz National Wildlife Refuge (JHNWR) in relation to FAA noise level guidelines and concludes that the resource is not affected. From the EA, it states that:

“guidelines establish that noise levels up to DNL 70 dB are compatible with outdoor recreation and education. In certain situations, in which a quiet setting is recognized as a feature or attribute of the site’s significance, additional factors may need to be considered. However, in this case the John Heinz NWR is adjacent to I-95 immediately north of the Airport and has historically experienced airport and highway-related noise. The proposed action would not result in noise levels in excess of the standard for outdoor education or recreational facilities, and project-related noise would not substantially impact the integrity of this resource at a level that constitutes an effective taking of some or all of the resource. Project-related noise at the John Heinz NWR would not result in a constructive use of the facility.” (p. 4-39)

Given the outsized significance of the Refuge as a recreational resource to the surrounding community of Eastwick, already burdened by noise levels from existing airport operations and the I-95, a fuller treatment of the degree of compatibility and the cumulative impacts of noise level increases seems warranted. It also does

not appear that Eastwick community residents were considered as potential stakeholders in the consideration of “less than significant” but still “of interest” noise level changes from the projected additional cargo aircraft activities, in terms of frequency as well as noise level (see Section 4.11). The West cargo site may be situated a distance from the Eastwick community. However, the increased flight traffic that these proposed improvements will bring, will directly and indirectly impact the Eastwick residents and their quality of life.

The DRAFT EA attempts to justify not needing a full EIS by merely referencing the impacts on “farmland and Wildland Scenic Rivers.” In Section 4—Environmental Consequences (4.1 Introduction), it states:

Each environmental category has a corresponding threshold level beyond which the impact is determined to be significant and an environmental impact statement (EIS) is required. However, in some circumstances, if sufficient mitigation measures to reduce the impacts below the threshold levels are included in the proposed project an EIS might not be required. As noted in Section 3, Affected Environment, the proposed action does not have the potential to affect farmland or wild and scenic rivers; therefore, no discussion of these categories is included in this section.

We discuss throughout this Comment that clearly, there are a far greater number of factors that must be considered before justifying an EA over an EIS conclusion.

EA does not fully assess impacts on Eastwick— an Environmental Justice community

Only a few months ago, the neighboring community of Eastwick was devastated by flooding again, this time by Tropical Storm Isaias. Four feet of water flooded the Eastwick community, flooding roads and homes requiring First Responders to rescue many Eastwick residents. The neighborhood near 79th and Lindbergh Boulevard became a raging river when the Darby Creek overflowed when Isaias hit the region. According to news reports, the Office of Emergency Management was urging residents to evacuate from their homes if there is more than a foot of flood water or their utilities are not working. The office and the Red Cross set up shop at a nearby Rite Aid store to help residents.



ELIZABETH ROBERTSON / Staff Photographer



Eastwick is an environmental justice community that has endured

decades of social and environment abuse. The disenfranchisement and distrust lingers as Eastwick continues to deal with chronic flooding, two superfund landfill sites, pollution from nearby airport and mega-highway, sub-standard homes built on dredge spoils. We understand that the scope of the West Cargo Expansion cannot resolve all the historic and current injustices impacting Eastwick, however, it should not ignore those issues either. It is clearly an objective of the West Cargo Expansion to increase the airport’s capacity and manage more incoming and out-going flight. A large number of those flights will be passing over the Eastwick community. And by “passing over,” we mean a couple of hundred feet over top of many Eastwick residents’ backyards, school playgrounds and parks. Plane traffic already impacts

the quality of life of Eastwick residents. The substantial increase in plane traffic that the West Cargo Expansion will produce can only degrade that more.

We understand that the Borough of Tinicum has similar impacts. While it does not appear to be addressed in the EA, we recognize that Tinicum Township reached a settlement with the City of Philadelphia and the Airport regarding the overall Capacity Expansion Project, which included a commitment to “the community most impacted by the expansion,” of \$1 million per year to Tinicum for the 20-year period or until the CEP is completed. [<https://www.tinicumtwpdelco.com/airport-news>] There is no mention of any negotiation with the City of Philadelphia regarding impacts to the Eastwick community from the project, and consideration of an equitable outlay to the community in compensation. In our view, a more extensive consideration of Environmental Justice is necessary.

There is the question of proper consideration of Environmental Justice. Section 4.12.2 summarizes an Environmental Justice analysis that recognized that “two census block groups closest to the project area have higher minority populations than Tinicum Township and the census tract closest to the project area has a higher low-income population than Tinicum Township.” The analysis was conducted to determine if there were disproportionately high and adverse impacts on these populations. There is a brief discussion of the potentially significant impacts and, in each case, a conclusion that mitigation will result in non-significant impacts. There is no mention of the overall and cumulative impacts of the air cargo expansion project on the neighboring community of Eastwick. Again, Eastwick is an Environmental Justice community overburdened by legacy pollution and with a predominant population of people of color. Impacts include but are likely not limited to increased traffic and noise from the construction and operations, air quality, potential aggravation of flooding conditions, increased disturbance to use and enjoyment of the Heinz Refuge and the health effects that those multiple impacts can lead to.

Impact to wetlands and water resources

The adequacy of the planned mitigation for the significant impacts to wetlands and surface waters is an additional area of concern. Given the vastly reduced extent of tidal wetlands and surface drainages in the Pennsylvania Coastal Zone area, it is vitally important that any further losses be fully justified and compensated in terms of ecological function. On the one hand, the proposed approach of establishing a large off-site wetland restoration at FDR park combined with on-site restoration and enhancement of a portion of the Long Hook Creek floodplain and reconnecting small streams is noteworthy in scale and in prioritizing the importance of preserving year-round and nesting habitat for the species that are presently supported, especially the state-endangered species such as the Red belly turtle. The planned mitigation at FDR Park appears to afford the potential to provide increased habitat of higher quality for some of the impacted species. At the same time, that appears dependent on resolving the “serious design constraints” discussed in App. K, including restoring adequate tidal flow and sufficient water flow to enable the reestablished and created wetlands to take hold.

Also, there is additional potential to counteract the historic losses of surface water connectivity on and near the project site that should be given further consideration as part of compensating for flood storage reduction. The potential to daylight some of the culverted channels and provide habitat enhancement within airport grounds is mentioned as a possibility; this should be further explored. In addition, further study should be conducted of reconnecting the Refuge to the Delaware River via Long Hook Creek, as recommended by JHNWR.

An issue related to climate change does not appear to have been considered, that of aggravating local “heat island effects” from the massive increase in impervious surface coverage will exacerbate. The “heat island effect” is:

Heat islands are urbanized areas that experience higher temperatures than outlying areas. Structures such as buildings, roads, and other infrastructure absorb and re-emit the sun's **heat** more than natural landscapes such as forests and water bodies. (www.epa.gov)

What are the potential consequences for adjacent water bodies, habitat and surrounding communities? This issue should be analyzed in terms of local surface water resources and any potential mitigation of its effects taken into consideration in an EIS where a total and cumulative impacts assessment can be accomplished.

Mitigation in FDR Park

The proposed wetlands mitigation at FDR park is adjacent to the FDR Golf Course. The current hydrology of the 38 acres of proposed created and restored wetlands most certainly has evolved over the recent history based on the largely well-drained open space of the 150 acre 18-hole golf course. We have concern that as recently as July 2019 (BillyPenn July 30, 2019) the golf course is slated to be converted to 12 new fields, several tennis and basketball courts, a playground and multi-use trails. This article also states that part of this \$200 million restoration will include restored natural areas. We are concerned that the surface and groundwater hydrology of the proposed fields and impervious courts will be substantially different from the current golf course. Those hydrologic differences do not appear to have been assessed in the EA. The hydrology of that 188+ acre area will most certainly change, resulting in robbing the proposed wetlands of needed baseflow and periodic inundation...or, conversely, flood them – either way compromising their ecological function and the stated mitigation required of the Expansion Plan for the wetlands lost at the West Cargo site.

Questions pertaining to Site Selection

FIVE SITES WERE EVALUATED BASED ON THE FOLLOWING CRITERIA:

1. Direct access to airfield
2. Efficient taxiway/runway connectivity
3. Proximity to deicing apron/facilities
4. Avoidance of runway incursions
5. Minimization of impacts to existing residences and businesses

According to data produced, **Site #1** was selected for the airport expansion project.

Table 2.1, the site analysis evaluation table, lists data relative to the five sites that were evaluated for the expansion project. Reviewing the data collected for each site and comparing the collected information to the one site that was selected (Site #1) raises some questions as to the reason why Site #1 was selected over, for example, Site #2. These questions/statements are listed below:

1. **Efficient Taxiway/Runway Connectivity: Site #1** - Would need to close, cross or relocate Tinicum Island Road, whereas **Site #2** - Would need no closures, crossings or relocations.
2. **Avoidance of Runway Incursions: Site #1** - No runway incursions, whereas **Site #2** - Need to cross RW9L/27R
3. **Proximity to Residential Neighborhood: Site #1** - Proximity to residential parcels, whereas **Site #2** - No adjacent residential parcels.
4. **Potential Area of Wetlands: Site #1** - 24 acres, whereas **Site #2** - 2 acres
5. **Potential area of Surface Waters: Site #1** - 17 acres, whereas **Site #2** - 0 acres

6. **Potential area of Floodplains: Site #1 - 90 acres, whereas Site #2 - 15 acres**

7. **Potential Impacts on Businesses: Site #1 - No impacts on existing businesses, whereas Site #2 - Currently UPS**

8. **Construction and Operational Feasibility: Site #1 - Feasible, whereas Site #2 - Would require relocation of UPS**

Advantages of selecting Site #2 over Site #1:

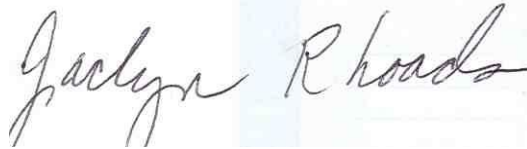
See Table 2.1 #'s: 1, 3, 4, 5, 6, ----- There is a concern for selection of Site #1 over Site #2 when there are lesser impacts on environmental and residential areas with Site # 2. Please provide justification as to why Site#1 was selected over Site# 2.

The Eastwick Friends and Neighbors Coalition, the Delaware Riverkeeper Network and the Darby Creek Valley Association urge the Department of Aviation and the Philadelphia International Airport to conduct a full EIS on the Expansion Plan incorporating all the new information and concerns discussed above.

Respectfully,



Fred Stine,
Citizen Action Coordinator
Delaware Riverkeeper Network



Jaclyn Rhoads,
President
Darby Creek Valley Association



Earl Wilson,
President
Eastwick Friends and Neighbor Coalition