



August 29, 2019

C&S Companies (First class mail and electronic)  
Attn: Christen M. Craig, Senior Project Environmental Scientist  
ccraig@cscos.com  
1500 Market Street, Suite 2410  
Philadelphia, PA 19102

**Re: Cargo City Redevelopment & Expansion Plan Preliminary Environmental Scoping/Request for Information**

Good Day,

This comment is written on behalf of the Delaware Riverkeeper Network and the Darby Creek Valley Association. We appreciate the opportunity to provide input on the proposal to prepare an Environmental Assessment on the Cargo City 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 Delaware Riverkeeper Network was established in 1988 and, with over 20,000 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.

In our review of the documents, it appears that there are two entities that appear have not received this information and therefore, have not had a similar opportunity to provide comment. Those entities are:

- The City of Philadelphia's Flood Risk-Management Task Force. The Task Force has been evaluating the City's ability to take full participation in the NFIP's Community Rating System (CRS), which encourages floodplain management activities that exceed the minimum National Flood Insurance Program (NFIP) standard. Some benefits of the CRS include potential reduction in flood insurance premiums for City residents and greater resiliency to flooding. Considering that the Expansion Plan will fill significant amounts of floodplain in an area that is hydrologically connected to an already flood prone area of Philadelphia, this project can impact the Task Force's efforts.

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- The Residents Against Airport Expansion in Delaware County (RAAED). RAAED was extensively involved and vocal in the PHL Capacity Enhancement Program. As such, their input and comment is essential to meet the spirit and intent of this public participation requirement.

We recognize that the July 2, 2019 comment deadline was extended due to the fact that not all stakeholders received proper notification. We believe that both the above entities should be provided that same opportunity and request an additional 30-day extension so that full and comprehensive input from relevant stakeholders can be gathered.

Additionally, according to the Expansion Plan Environmental Distribution List, these documents were sent to the Federal Emergency Management Agency (FEMA). However, in our opinion, were addressed generically to:

Federal Emergency Management Agency  
500 C Street S.W.  
Washington, D.C. 20472

FEMAs input in this scoping process is critical. Did this notification reach the appropriate person or department? Please advise who at FEMA received it and has it been processed completely.

We believe that a full Environmental Impact Statement (EIS) must be conducted on the Expansion Plan. We recognize that an EIS for the CEP was finalized in 2010, however, much has changed in the subsequent 9+ years in terms of up-stream development, wildlife presence and populations and the impacts of sea-level rise, storm surges and other effects of Climate Change. The Expansion Plan consists of increasing impervious coverage of well over 100-acres of floodplain. It will directly and indirectly impact the Long Horn and Lower Darby creeks and the Delaware River. It will dramatically reduce the flood absorption and storage capabilities in this localized area. As such, the direct and indirect impacts have changed from the 2010 ROD and must be updated so that an informed, scientifically-based decision can be made by the community and agencies alike.

Further information and data on area wildlife will not be addressed in an EA. Specifically, new data exists on the Atlantic sturgeon, including populations, sightings and incidental takes. The Delaware River population of Atlantic Sturgeon, which is designated as endangered pursuant to the Endangered Species Act, is genetically unique and today has a surviving population that includes less than 300 spawning adults.

Additionally, the Red-bellied turtles are going to be significantly impacted by this plan and are not mentioned in the letter supplied to our groups. Although it is mentioned in the 2015 Environmental Review, the letter failed to mention it and therefore should resubmit to all parties for proper comment since this turtle has its last stronghold on this site and the John Heinz National Wildlife Refuge in Pennsylvania! In addition, the referenced mitigation plans in the 2015 Environmental Review have not been supplied and should be provided to all parties especially the John Heinz National Wildlife Refuge.

According to PA Fish and Boat Commission:

*Range.* Although recent sightings have been sparse at best, the redbellied turtle was known, at one time at least, to have inhabited the lower Delaware River, the lower Susquehanna River and a portion of the Potomac River Basin, which reaches into a small section of southcentral Pennsylvania. Today it is found primarily in the lower Delaware River Drainage and at one known location in the Potomac River Basin. Its range extends from southern New Jersey and eastern West Virginia to northeast North Carolina.

It is clear that the last remaining places for the turtles are being severely degraded and eliminated by this plan. The mitigation plans should include strategies for restoring flow around the airport which could allow for some of the red-bellied turtles to remain on the site. In addition, the stormwater management measures should be changed to help retain some additional wetland acreage of about 8 acres. There are many innovative ways to manage stormwater and should be utilized instead of off-site mitigation.

Also, an EIS is necessary due to the rapid increase in recreational and educational water activities in the Delaware River Estuary, including in the Lower Schuylkill River, the Darby Creek and across the River in the City of Camden. The Expansion Plan paves-over 100+ acres of floodplain. The three stormwater basins, which total only 11.1 acres, will not address flood and flooding issues. Stormwater management and flood mitigation are different hydrologic realities and designing and installing these three stormwater basins will not compensate nor mitigate for the lost flood absorption and storage from paving the floodplain.

Paddling trips, including both “primary” and “secondary” contact as defined in the Clean Water Act, are increasing at the John Heinz National Wildlife Refuge (Darby Creek), Penn’s Landing (Delaware River), Bartram’s Gardens (Lower Schuylkill River) and across the Delaware River in Camden (Delaware and Cooper rivers and tidal Newton Creek). By paving over 100+ acres, which will exacerbate flooding, could very likely diminish and degrade water quality and increase flooding thereby diminishing these renewed recreational and educational activities. An EIS would more fully and comprehensively assess this new information where an EA would not.

Another relevant example of why a full EIS is critical is the proposed land development in neighboring Eastwick, Pa. Eastwick is in Southwest Philadelphia and adjacent to PHL and the John Heinz National Wildlife Refuge. Eastwick is largely within FEMA’s designated Special Flood Hazard Area and much of the large scale development and redevelopment being proposed in the floodplains of Eastwick.

Eastwick is directly and hydrologically linked to the Expansion Plan area through the tidal Darby and Long Horn creeks and the Delaware River. Localized and catastrophic flooding has been a long term problem in Eastwick. If flood storage capabilities is diminished, as will likely be the case with over 100-acres of floodplain being lost and only 11 acres of stormwater basin being installed, flooding from that increased runoff and the impacts of rising sea-levels and storm surges, will only exacerbate Eastwick’s flooding. Below are relevant points from a recent study entitled *Increasing Resilience in the Lower Darby Creek Area – a Summary 31 July 2017/10 June 2019:*

- The Lower Darby Creek is channelized to Tinicum Marsh. The channel (already) cannot accommodate peak flows causing the water surface elevation to rise and the creek to overtop its banks and flow across the meadow at the entrance of the John Heinz National Wildlife Refuge. In large storm events, the water flows through the entry drive, and down 86th St.
- The Lower Darby Creek Area (LDCA) exhibits compound flooding event(s). Recent research by CCRUN (Consortium for Climate Risk in the Urban Northeast) demonstrate that the LDCA experiences not just tidal flooding and downstream flooding, but a combination of both that results in a different type of flooding. This is an emerging area of research. Combines storm events cause the most flood damage in the LDCA.
- Mario Lanza Blvd Corridor/CSX Tracks/Formal Route 37 Trolley Bed. During large and infrequent storm events, storm surge or high storm tides travel up the former Route 37 tracks and Conrail tracks entering Eastwick along the Mario Lanza Blvd. corridor. Along the corridor, there is no significant

ridgeline separating the lower Darby Creek watershed from the Schuylkill River/Mingo Creek watershed. During the events, the two systems can reconnect causing significant flooding in the area.

Of special important and significance is that the Expansion Plan is directly adjacent to the CSX Tracks. The tracks, as discussed in this study, already indicate that they are a pathway for floodwaters into Eastwick during the infrequent (but becoming more frequent due to Climate Change) storms. The Expansion Plan will pave-over 100+ acres of floodplain and reduce the natural soils' abilities to absorb and store floodwaters thereby likely exacerbating flooding in Eastwick. Increased areas of fill reduce available flood storage and put residents at increased risk.

- An Unwise Practice of Filling Tidal Wetlands and Land Alteration of Tinicum Marsh have put the existing residents at great risk. 6,000 acres of tidal freshwater wetlands that once protected the Delaware River shoreline have been reduced to 286 acres eliminating the flood protection they historically provided. Filling has also reduced the area available for flood storage and protection. Best management practices put forth by the Association of State Floodplain Managers state unequivocally that additional filling on floodplains should be prohibited. The extreme example of such practice is Houston during Hurricane Harvey.
- Room for Rivers (and Streams): Larger flows, Less space – 10 pounds of water in a 1-pound bag. The Expansion Plan floodplain filling will dramatically constrict flooding and stormwater flows from what even they are today. Darby and Cobbs creeks are channelized through much of their course constricting peak flows and causing the aforementioned flooding. Long Hook Creek is also significantly constricted. As the upper Cobbs and Darby watershed have become increasingly developed, more runoff has been generated with less space to accommodate peak flows. In 2018, annual rainfall was 17” above the normal annual rainfall of 40” and 2019 is on track to bring even more rainfall. With warmer annual temperatures due to climate change, precipitation is also expected to rise. Simultaneously, increased economic activity and population density in the area are at increased risk. Climate change further threatens the area and residents' livelihoods as more precipitation results in increased flows but far less space to accommodate them. Rivers and creeks will spread further out over their floodplains. Over 70% of Eastwick is in the 100-year (one percent annual chance) floodplain and floods during large storm events.

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, to provide the relevant documents and notices to the stakeholders we have identified above and then extend the comment period, so those entities can provide their input.

Respectfully,



Fred Stine,  
Citizen Action Coordinator  
Delaware Riverkeeper Network



Jaclyn Rhoads,  
President  
Darby Creek Valley Association