APPENDIX K

Clean Water Act Section 404(b)(1) Analysis

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SECTION 404(B)(1) ANALYSIS

1. INTRODUCTION

The Section 404(b)(1) Guidelines of the Clean Water Act (Guidelines) provide regulations outlining measures to avoid, minimize, and compensate for impacts of projects on wetlands. The goal of the Guidelines is "to restore and maintain, the chemical, physical, and biological integrity of waters of the United States (waters of the US) through the control of discharges of dredged or fill material." The regulations set forth in 40 CFR Section 230 are the substantive criteria issued by the US Environmental Protection Agency (USEPA), used in evaluating discharges of dredged or fill material into waters of the US.

Signature Aviation is proposing improvements to their Fixed Based Operator (FBO) facilities at Teterboro Airport (TEB) located in the Boroughs of Teterboro and Moonachie, Bergen County, New Jersey. The proposed Signature East and Signature South projects (Proposed Action) at Teterboro Airport are being evaluated by the Federal Aviation Administration (FAA) in compliance with the National Environmental Policy Act (NEPA). In accordance with FAA Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*, and applicable US Department of Transportation Orders, an assessment of potential wetland impacts is required to ensure that effects to aquatic resources are fully considered. Per the FAA Order 1050.1 Desk Reference, the FAA needs to consult with agencies having a special interest in preserving wetlands, which for this project includes the New Jersey Department of Environmental Protection (NJDEP), US Fish and Wildlife Service (USFWS), US Environmental Protection Agency (USEPA), and the US Army Corps of Engineers (USACE).

Because a Section 404 permit will be required for the Proposed Action, an analysis of wetland impacts to comply with the Guidelines has been developed and is presented below.

2. PROPOSED ACTION

The Proposed Action would include development of aircraft apron, hangars, and support facilities at the Signature East and Signature South sites.

- **Proposed Signature East Facilities**. The proposed development at the Signature East site would be southwest of the existing Signature East facilities and west of the Aviation Hall of Fame and Museum. As shown on **Exhibit 1**, site development would include construction of the following new facilities:
  - 40,500-square-foot hangar structure with 36,000 square feet of hangar space and 4,500 square feet of FBO terminal facilities;
  - 170,000-square-foot (3.9-acre) aircraft apron; and
  - 10,000-square-foot automobile parking lot.
- **Proposed Signature South Facilities**. The proposed development at the Signature South site would be northeast of the existing Signature South facilities. In response to agency comments and coordination and due to site topography, the overall footprint of the Proposed Signature South facilities was reduced by approximately 38,500 square feet, from approximately 350,700 square feet to approximately 312,200 square feet. The reduction included approximately 4,300 square feet from the automobile parking lot, approximately

4,500 square feet from the aircraft hangar and FBO terminal combined, and approximately 29,700 square feet from the aircraft apron. As shown on the updated **Exhibit 2**, site development would include construction of the following new facilities:

- 90,500-square-foot hangar structure including one 40,400-square-foot aircraft hangar and one 43,100-square-foot aircraft hangar (83,500 square feet of new hangar space) with 14,000 square feet of FBO terminal facilities, consisting of a single, two-story terminal with a 7,000-square-foot footprint;
- 197,300-square-foot (4.5-acre) aircraft apron;
- 24,400-square-foot automobile parking lot; and
- 30-foot-wide access drive, approximately 700 feet in length, connecting the proposed parking area to the existing Signature South parking facility.

Implementation of the Proposed Action would impact 11.74 acres of USFWS designated wetlands, 12.67 acres of NJDEP designated wetlands, and 10.90 acres of USACE designated wetlands, as summarized in **Table 1**.

Off-site wetlands mitigation would be performed to compensate for the on-site wetland impacts, as there are no suitable sites on Airport property, nor would FAA allow wetland mitigation to occur within close proximity to TEB runways or aircraft movement areas.[1] Signature has identified the following mitigation sites, as detailed below and shown on **Exhibit 3**:

- 6.79 acres of PEM wetland impacts would be mitigated through the use of 6.56 credits purchased at the Kane Wetland Mitigation Bank and 0.23 credits purchased at the MRI-3 (Evergreen) Mitigation Bank.
- 0.68 acres of palustrine scrub-shrub wetland impacts would be mitigated through the purchase of 0.68 credits at the MRI-3 (Evergreen) Mitigation Bank.
- 3.43 acres of palustrine forested wetland impacts would be mitigated through the purchase of 3.43 credits at the Upper Penhorn Creek Mitigation Bank located at the Guarini Tract.[2] GreenVest is in the process of obtaining final signatures from the USACE and NJDEP regarding the Upper Penhorn Creek Mitigation Bank's approval. If the Upper Penhorn Creek Mitigation Bank is not formally approved prior to receipt of a Section 404 permit, Signature has agreements in place with GreenVest to use the Guarini Tract as a "turnkey"[3] mitigation site that would enhance 10.29 acres of degraded palustrine forested wetlands within the limits of the proposed mitigation bank. GreenVest will secure the necessary local, State, and Federal licenses, permits, approvals, and consents required to perform compensatory mitigation at this site.

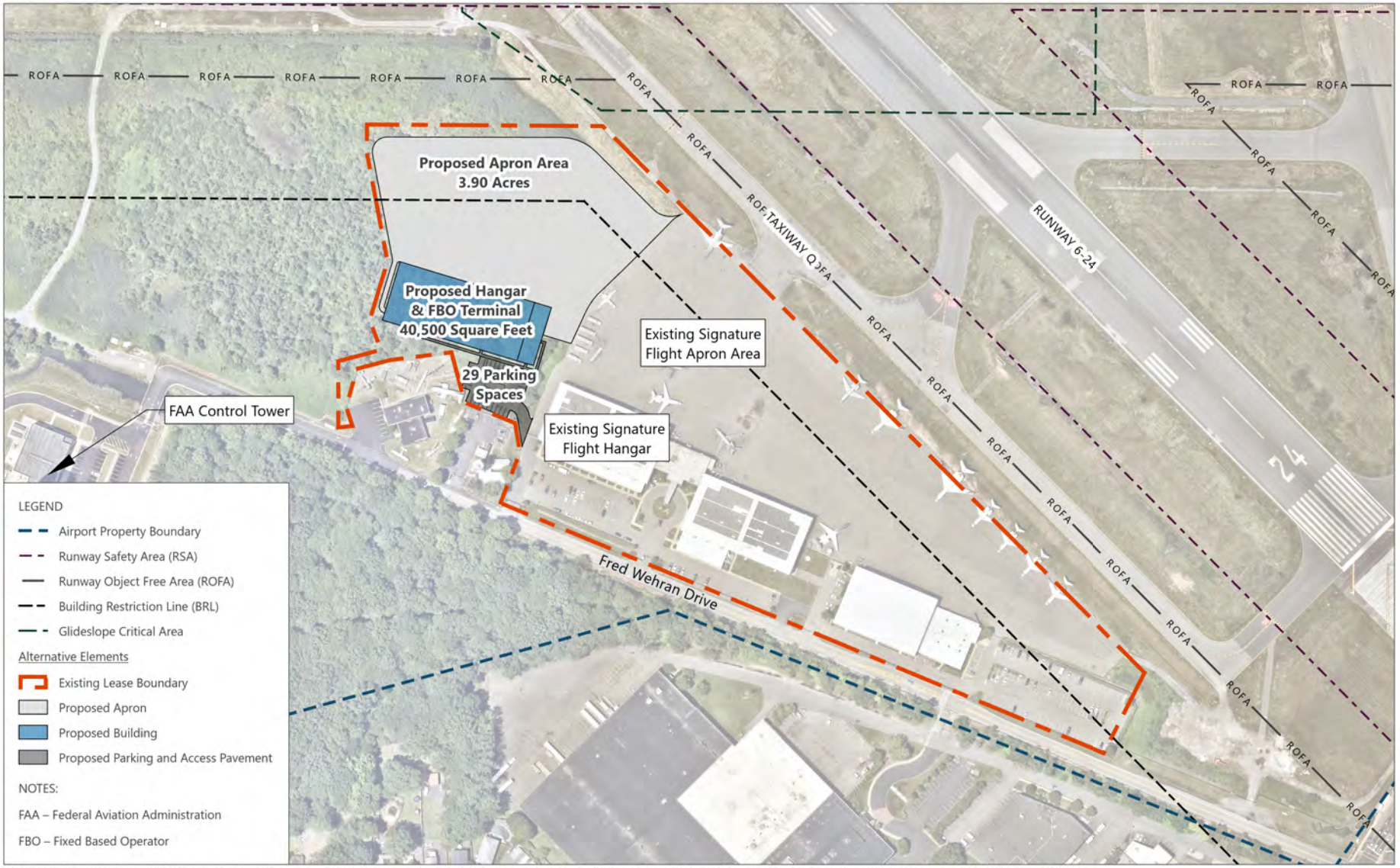
With implementation of these mitigation measures, wetland impacts associated with the Proposed Action would be mitigated.

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[1] US Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5200-33C, *Hazardous Wildlife Attractants on or near Airports*, February 21, 2020. For airport serving turbine-powered aircraft, FAA recommends a separation distance of 10,000 feet from the aircraft operations area and wetlands.

[2] GreenVest has applied to establish the Upper Penhorn Creek Mitigation Bank at the Guarini Tract located in the Township of North Bergen, Hudson County, New Jersey. The Upper Penhorn Creek Mitigation Bank is currently being reviewed by the Meadowlands Interagency Mitigation Advisory Committee, which consists of representatives from USACE, NJDEP, USEPA, USFWS, NOAA, and NJSEA.

[3] A "turnkey" mitigation approach refers to a ready-to-implement compensatory mitigation package. Under this approach, GreenVest would develop the required mitigation plan, obtain applicable permits and regulatory approvals, implement the approved mitigation measures, and conduct the required monitoring and maintenance necessary to demonstrate that applicable performance standards and mitigation requirements have been satisfied.



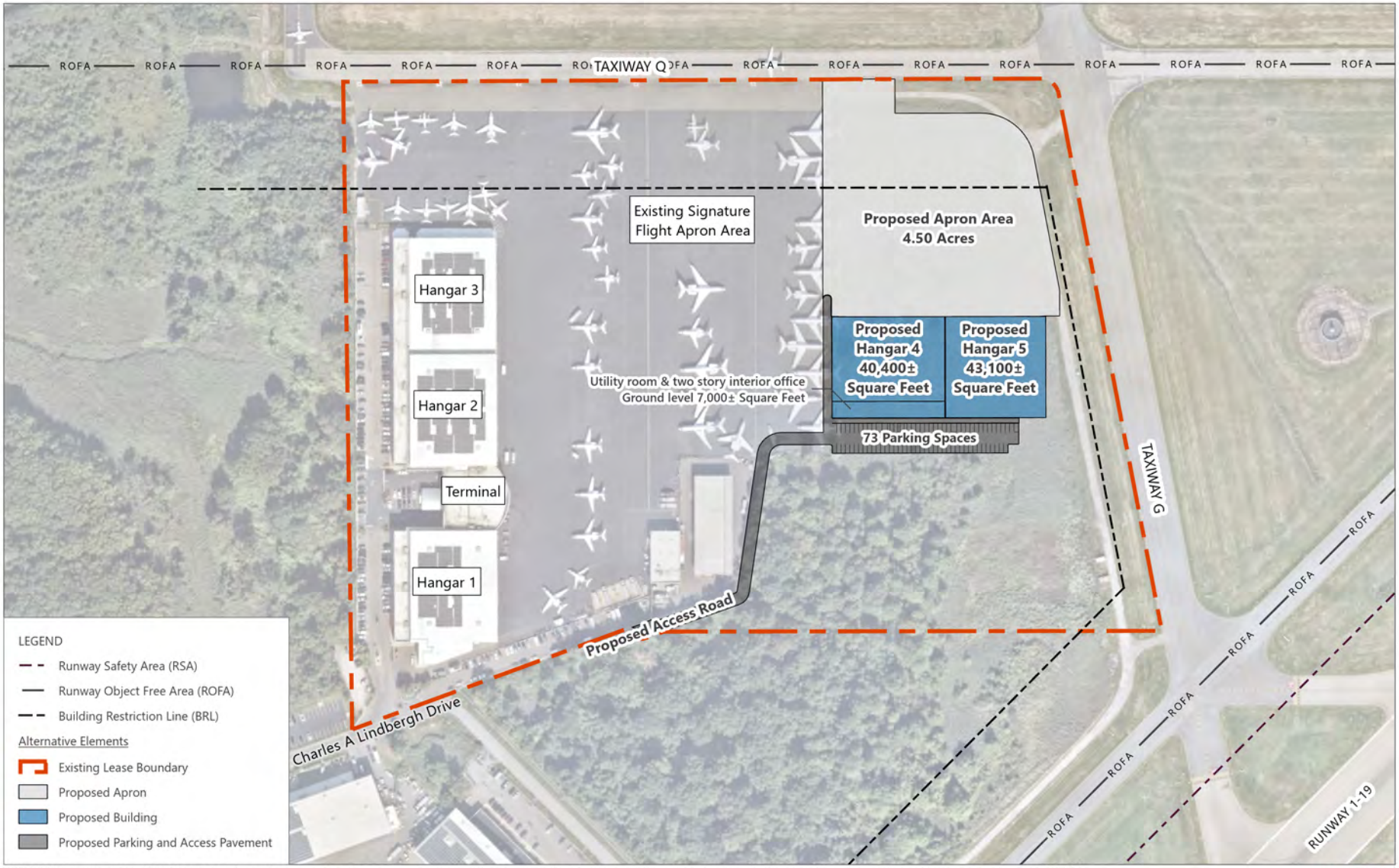
SOURCES: Nearmap, June 2024 (aerial photography – for visual reference only, may not be to scale); Port Authority of New York and New Jersey, *Teterboro Airport, Airport Layout Plan*, December 2014 (existing Airport elements); Signature Flight Support Corporation, October 2025 (alternative elements); Signature Flight Support Corporation, December 2025 (existing lease boundary).

EXHIBIT 1

NORTH 0 300 ft

PROPOSED SIGNATURE EAST SITE PLAN

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh1_ProposedSignatureEastSitePlan_2026_0820



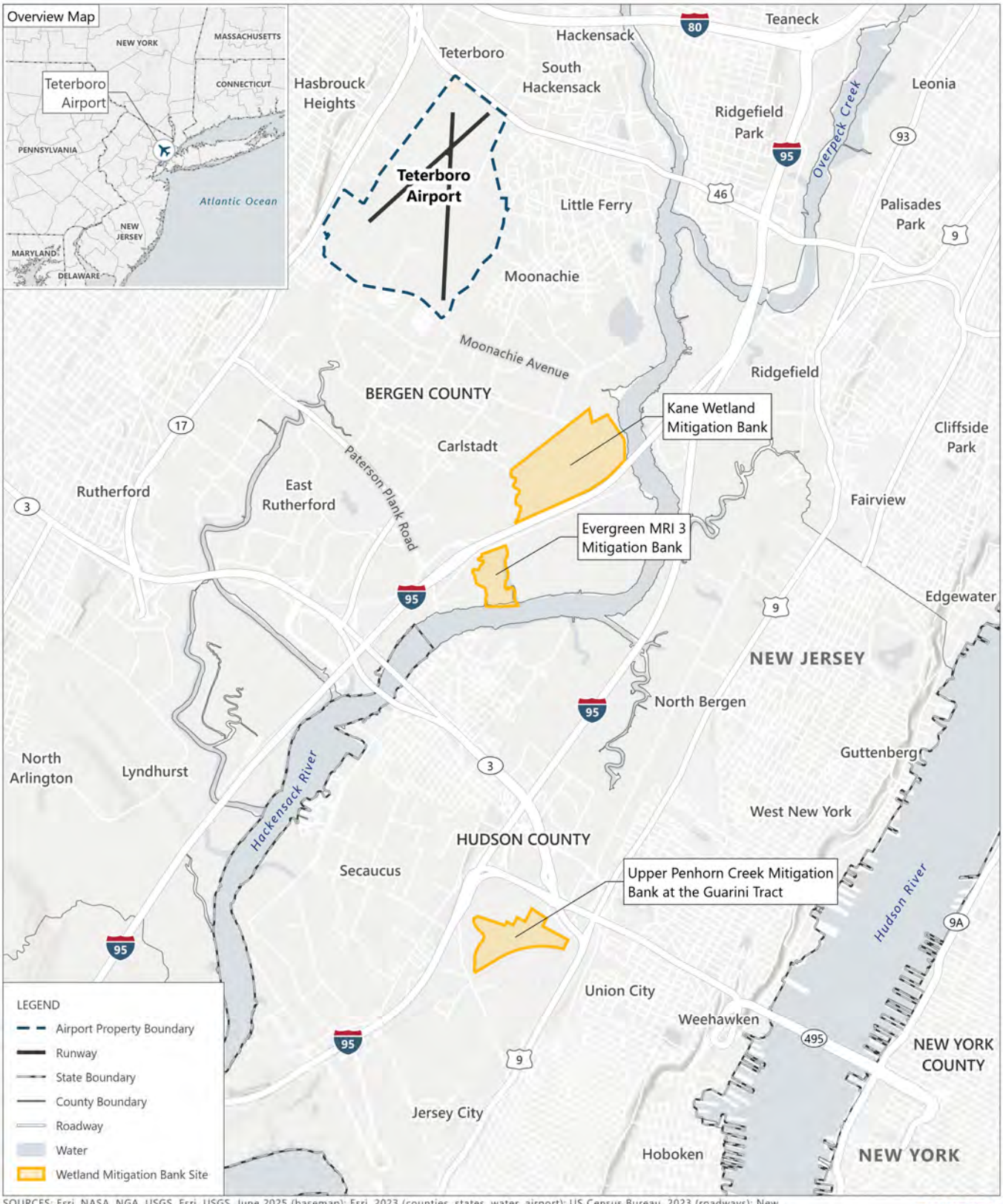
SOURCES: Nearmap, June 2024 (aerial photography – for visual reference only, may not be to scale); Port Authority of New York and New Jersey, *Teterboro Airport, Airport Layout Plan*, December 2014 (existing Airport elements); Langan, September 2026 (alternative elements); Signature Flight Support Corporation, December 2025 (existing lease boundary).

EXHIBIT 2

NORTH 0 300 ft

PROPOSED SIGNATURE SOUTH SITE PLAN

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh2_ProposedSignatureSouthSitePlan_2026_0918



SOURCES: Esri, NASA, NGA, USGS, Esri, USGS, June 2025 (basemap); Esri, 2023 (counties, states, water, airport); US Census Bureau, 2023 (roadways); New Jersey Department of Environmental Protection, Bureau of GIS, July 2018 (Kane and MRI Phase 3 mitigation banks); Ricondo & Associates, Inc., April 2024 (GreenVest F Guarini tract mitigation site).

EXHIBIT 3

POTENTIAL WETLAND MITIGATION SITES

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh3_PotentialWetlandMitigationSites_2026_0825

TABLE 1 WETLANDS IMPACTED BY PROPOSED ACTION

	FRESHWATER FORESTED WETLAND/SHRUB (ACRES)			FRESHWATER EMERGENT WETLAND (ACRES)			MANAGED WETLAND IN MAINTAINED LAWN GREENSPACE			TOTAL (ACRES)		
	USFWS[1]	NJDEP[2]	USACE[3]	USFWS[4]	NJDEP[5]	USACE[6]	USFWS[7]	NJDEP[8]	USACE[9]	USFWS	NJDEP	USACE
Signature East												
Proposed Action	3.98	3.90	3.22	1.26	1.16	0.59	0.00	0.35	0.01	5.24	5.41	3.82
Signature South												
Proposed Action	0.28	0.45	0.89	6.22	6.81	5.78	0.00	0.00	0.41	6.50	7.26	7.08

NOTES:

1 – Includes the following USFWS wetland categories: "freshwater forested / shrub wetland"

2 – Includes the following NJDEP wetland categories: "deciduous scrub / shrub" and "deciduous wooded wetlands"

3 – Includes the following USACE wetland categories: "palustrine forested wetland" and "palustrine scrub-shrub"

4 – Includes the following USFWS wetland categories: "freshwater emergent wetland"

5 – Includes the following NJDEP wetland categories: "herbaceous wetlands" and "*Phragmites* dominant wetlands"

6 – Includes the following USACE wetland categories: "palustrine emergent *Phragmites australis* wetland"

7 – The USFWS wetlands did not include a wetland category comparable to managed wetland in maintained lawn greenspace.

8 – Includes the following NJDEP wetland categories: "managed wetland in maintained lawn greenspace"

9 – Includes the following USACE wetland categories: "palustrine emergent persistent wetland"

SOURCES: Port Authority of New York and New Jersey, *Teterboro Airport, Airport Layout Plan*, December 2014; New Jersey Department of Environmental Protection, NJDEP Bureau of GIS, "Land Use/Land Cover of New Jersey 2020", https://gisdatanjdep.opendata.arcgis.com/datasets/2deaaa3cadd94166bdbff92a44ade284_5/explore?location=40.847477%2C-74.057436%2C15.00 (accessed February 18, 2025); New Jersey Department of Environmental Protection, NJDEP Bureau of GIS, "Wetlands of New Jersey" (from Land Use/Land Cover 2021 Update), https://gisdata-njdep.opendata.arcgis.com/datasets/5a29ffe1eda24da5bd8e2a2297b90e24_2/explore?location=40.850111%2C-74.060833%2C15.00 (accessed February 18, 2025); US Army Corps of Engineers, *Approved Jurisdictional Determination Request NAN-2024-00049-EMI by Signature Flight Support LLC – Signature South Expansion Project,* June 11, 2024; US Army Corps of Engineers, *Approved Jurisdictional Determination Request, NAN-2024-00175-EMI by Signature Flight Support, LLC – Signature East Expansion Project*, June 11, 2024.

3. PURPOSE AND NEED

3.1 PURPOSE OF THE PROPOSED ACTION

The purpose of the Proposed Action is to increase aircraft parking, hangar space, and associated facilities at Signature East and Signature South leaseholds to better accommodate both existing and forecasted demand while enhancing the safety and efficiency of aircraft operations related to aircraft parking.

3.2 NEED FOR THE PROPOSED ACTION

The Proposed Action is needed to address the following issues that result from inadequate Signature East and Signature South facilities at TEB.

- The existing demand for Signature facilities exceeds capacity resulting in apron congestion, and increased emissions from idling aircraft; the facilities shortfall is expected to increase as operations are forecast to increase, and the percentage of large jet aircraft continues to grow at a faster rate than other aircraft classifications.
- The modern general aviation (GA) fleet has steadily increased in size (both wingspan and length) and is equipped with winglets, which reduces aircraft parking efficiency (see Section 2.2.2 of the Environmental Assessment or EA).
- Given the proximity of TEB to Manhattan, aircraft have used, and are expected to continue using, TEB even when space for parking aircraft at TEB is not available. This results in the performance of ferry flights. A ferry flight occurs when a pilot lands at TEB but cannot find a space to park the aircraft; the pilots have to drop passengers off, fly to another airport where they can park, then fly back to pick the passengers up (see Section 2.2.3 of the EA).
- Congested apron and hangar facilities result in operational inefficiencies, increased congestion, damage to aircraft, and increased safety risks to Signature personnel, pilots, and passengers using Signature's aircraft parking aprons and hangars.

Additional details and supporting information on the need for the project are contained in Section 2 of the EA. Because the Proposed Action is for the purpose of improving facilities for the use of aircraft, the Proposed Action is not a water dependent project, as defined by the Guidelines.

4. ALTERNATIVES

FAA Order 1050.1G[4] requires a thorough and objective assessment of the Proposed Action, the No Action Alternative, and alternatives to be considered to the degree commensurate with the nature of the Proposed Action and agency experience with the environmental issues involved. The alternatives analysis presented in the EA is consistent with the requirements of FAA Order 1050.1G. Due to the nature of the Proposed Action, the metropolitan New York City area was used as the geographic extent for the identification and evaluation of alternatives.

[4] US Department of Transportation, Federal Aviation Administration, Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*, June 30, 2025.

4.1 IDENTIFICATION AND DESCRIPTION OF ALTERNATIVES

The alternatives analysis considered and evaluated six main categories of alternatives in addition to the No Action Alternative. These categories include: (1) No Action Alternative; (2) Use of Other Modes of Transportation; (3) Use of Other Existing Airports Alternatives; (4) Use, Reconfiguration, or Expansion of Signature West Alternative; (5) Signature East Alternatives; (6) Signature South Alternatives; and (7) Development of Other Sites at TEB Alternative. The Port Authority and Signature have conducted extensive agency coordination with a number of federal and state agencies as part of the environmental process. Some of the alternatives, notably Use of Other Modes of Transportation and Use of Other Existing Airports, have been repeatedly mentioned by these agencies as alternatives that should be considered during the NEPA process. **Table 2** identifies the potential alternatives categories identified for this analysis. A complete description of each of the alternatives is provided in Appendix D of the EA.

TABLE 2 ALTERNATIVES CATEGORIES

ALTERNATIVE CATEGORIES	ALTERNATIVES
Alternative 1: No Action Alternative	No Action Alternative
Alternative 2: Use of Other Modes of Transportation	Use of Other Modes of Transportation
Alternative 3: Use of Other Existing Airports Alternatives	Use of John F. Kennedy Airport (JFK)
	Use of Newark Liberty International Airport (EWR)
	Use of New York Stewart Airport (SWF)
	Use of LaGuardia Airport (LGA)
	Use of Republic Airport (FRG)
	Use of Westchester County Airport (HPN)
	Use of Morristown Municipal Airport (MMU)
Alternative 4: Use, Reconfiguration, or Expansion of Signature West	Use, Reconfiguration, or Expansion of Signature West
Alternative 5: Signature East Alternatives	Signature East Configuration 1
	Signature East Configuration 2
	Signature East Configuration 3
	Signature East Configuration 4
	Signature East Configuration 5 (Proposed Action)
Alternative 6: Signature South Alternatives	Signature South Configuration 1
	Signature South Configuration 2
	Signature South Configuration 3
	Signature South Configuration 4
	Signature South Configuration 5
	Signature South Configuration 6 (Proposed Action)
	Signature South Configuration 7
Alternative 7: Development of Other Sites at TEB	Development of Site 1 at TEB
	Development of Site 2 at TEB
	Development of Site 3 at TEB

NOTE: TEB – Teterboro Airport FBO – Fixed Based Operator
SOURCE: Ricondo & Associates, Inc., January 2025.

4.2 ALTERNATIVES SCREENING PROCESS AND CRITERIA

The screening process and associated criteria used to identify feasible alternatives for detailed environmental analysis is described in this section. A two-step screening process was established to evaluate the list of potential alternatives to determine which of them are reasonable and should be carried forward for detailed environmental impact analysis. In order for an alternative to be reasonable, it must meet the Purpose and Need of the Proposed Action and must be practical or feasible from the technical and economic standpoint and using common sense. An alternative may still be reasonable even if it is outside the legal jurisdiction of the FAA or if there is a conflict with existing law.

In Step 1, each alternative was analyzed to determine whether the alternative could achieve the Purpose and Need. Alternatives that would not meet all elements of the Purpose and Need were determined to be unreasonable and, therefore, were eliminated from further consideration. Alternatives that met all elements of the Purpose and Need were moved to Step 2 of the screening process.

In Step 2, alternatives that passed the Step 1 screening process were evaluated based on whether the alternative would be reasonable to construct and operate. These screening criteria include whether the alternative:

- could be implemented without major modifications to airfield infrastructure, including taxiways and/or utilities;
- is reasonable to construct given site constraints/considerations; and
- is reasonable to operate given existing airfield operational patterns.

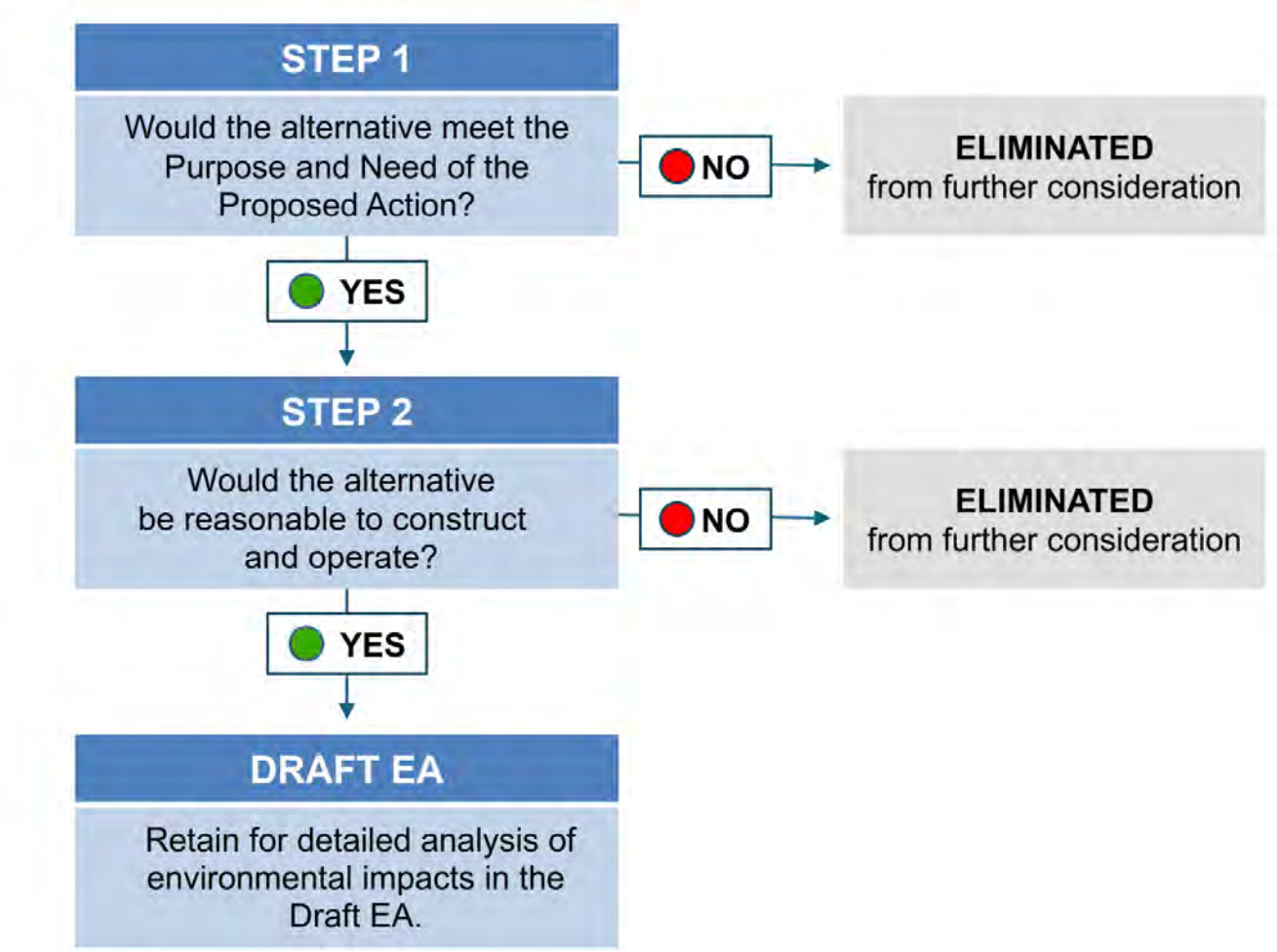
Alternatives that met all elements of the criteria for determining whether the alternative is reasonable to construct and operate were retained for a detailed evaluation of environmental impacts. Alternatives that would not be reasonable to construct and operate were eliminated from further consideration. However, as required by NEPA, the No Action Alternative was also retained for detailed analysis. **Exhibit 4** conceptually portrays the screening process.

4.2.1 SCREENING STEP 1: WOULD THE ALTERNATIVE MEET THE PURPOSE AND NEED OF THE PROPOSED ACTION?

This section identifies the Step 1 screening criterion used to evaluate each alternative against the criterion. The following question was developed to determine whether the alternative would meet the Purpose and Need of the Proposed Action and should be advanced to Step 2 of the screening process.

- Does the alternative provide adequate facilities to meet the needs of the aircraft fleet currently operating and forecast to operate at Signature facilities by allowing for a configuration of facilities that would reduce operational inefficiencies, safety risks, and ferry flights due to congestion?

EXHIBIT 4 ALTERNATIVES SCREENING PROCESS



SOURCE: Ricondo & Associates, Inc., May 2024.

— *Adequate FBO Facilities, Apron and Hangar Space*: This criterion evaluates if an alternative would generally meet the 2044 area requirement for apron space,[5] hangar space, FBO terminal, and automobile parking as identified in **Table 3**. The total overall facilities requirement for both Signature East and Signature South is approximately 600,300 square feet; however, based on the existing constraints at the Airport, development of one or more sites may be required to meet all facility requirements. To meet this criterion, an alternative would need to provide new facilities or expand existing aircraft parking facilities by approximately 222,700 additional square feet to meet the identified existing and future demand for Signature East facilities and approximately 297,300 additional square feet to meet the identified existing and future demand for Signature

[5] Usable apron for aircraft parking excludes taxilanes that provide access to hangars and aircraft parking positions. However, for purposes of the alternative screening analysis, only the total apron space was used for comparison to area requirements.

South facilities.[6] Additionally, adequate aircraft parking facilities allows for accommodation of the existing and forecast aircraft fleet mix consisting of larger jets and aircraft with winglets, allows for efficient apron operations, creates expanded safety margins for pilots and FBO staff, and reduces ferry flights. Therefore, this criterion assesses whether each alternative can accommodate these facility requirements and meet the Purpose and Need for the project.

TABLE 3 FACILITY REQUIREMENTS

FACILITY COMPONENT	EXISTING AREA (SQ FT)	TOTAL 2044 AREA REQUIREMENT (SQ FT)	ADDITIONAL AREA REQUIRED (SQ FT)
Signature East			
Aircraft Parking	277,000	499,700	222,700
Apron for Aircraft Parking [1]	192,500	380,100	187,600
Aircraft Hangars [2]	84,500	119,600	35,100
FBO Terminal	6,400	10,700	4,300
Automobile Parking	71,600	87,200	15,600
Total	**355,000**	**597,600**	**242,600**
Signature South			
Aircraft Parking	471,300	768,600	297,300
Apron for Aircraft Parking [1]	340,300	551,300	211,000
Aircraft Hangars [2]	131,000	217,300	86,300
FBO Terminal	16,000	22,600	6,600
Automobile Parking	76,400	130,200	53,800
Total	**563,700**	**921,400**	**357,700**

NOTES:
SQ FT – Square Feet
1 Usable apron for aircraft parking (excludes taxilanes to provide access to hangars). However, for purposes of the alternative screening analysis, only the total apron space was used for comparison to area requirements.
2 Includes hangar space for based aircraft and tenant aircraft.
SOURCE: Ricondo & Associates, Inc., June 2025.

4.2.2 SCREENING STEP 2: WOULD THE ALTERNATIVE BE REASONABLE TO CONSTRUCT AND OPERATE?

This section identifies the Step 2 screening criteria used to evaluate each alternative against the criteria. The following questions were developed to determine whether the alternative would be reasonable to construct and operate. If the alternative met the Step 2 screening criteria, it was retained for detailed analysis of its potential environmental effects in the EA.

[6] As discussed in Section 2.2.1, facility requirements are based on general space needs, which may be higher or lower depending on site limitations, configuration issues, and configuration of facility components to meet current and forecast demand. Thus, facility requirements identified during analysis may differ from what is proposed for construction and not the final development numbers. As such, this criterion evaluated whether an alternative would generally meet the minimum space requirements (within 10 percent).

- Could the alternative be implemented without major modifications[7] to airfield infrastructure?
  - *Taxiway Connectivity*: This criterion evaluates if an alternative would be accessible to aircraft via existing airfield pavement. An alternative was not considered reasonable if it required construction of a new taxiway as this would significantly increase the cost, schedule, and scope of the overall project.
  - *Utility Infrastructure*: This criterion evaluates if an alternative would be accessible to existing utility infrastructure. An alternative was not considered reasonable if it required bringing new utilities to the site as this would significantly increase the cost, schedule, and scope of the overall project.
- Is the alternative reasonable to construct[8] given site constraints/considerations?
  - *Site Topography:* This criterion evaluates if the alternative can be constructed within the physical topography of the site. An alternative was not considered reasonable if significant grading or excavation, defined as disturbance of more than 10 acres, would be required as this would significantly increase the cost, schedule, and scope of the overall project. This criterion also evaluates if any structures are present and the extent of any required demolition.
- Is the alternative reasonable to operate given existing airfield operations?
  - *Minimize Runway Crossings*: This criterion evaluates if the alternative minimizes the need for aircraft to cross active runways. An alternative was not considered reasonable if it required frequent or unnecessary runway crossings that could disrupt airfield operations or increase safety risks.

4.2.3 ALTERNATIVES SCREENING RESULTS

A detailed evaluation of each alternative and whether they did or did not meet the screening criteria is presented in Section 3 of the EA. Based on the evaluation of the screening criteria, Alternative 5 (Configurations 2 through 5) and Alternative 6 (Configurations 2 through 7) were identified as fulfilling the Purpose and Need of the Proposed Action and would be reasonable to construct and operate. The Proposed Action would require an increase in approximately 600,300 square feet of FBO facilities at TEB, including approximately 520,000 square feet of aircraft parking facilities (including apron and hangar space), to meet Signature's existing and forecast demand. To meet the Purpose and Need of the Proposed Action, development at both the Signature East and Signature South sites would be needed in order to adequately fulfill the overall FBO facility and aircraft parking requirements. As such, all of the expansion configurations for both Signature East and Signature South were retained for a detailed evaluation of environmental impacts to determine the environmentally preferred configurations and/or combination of configurations needed to meet the facility requirements identified in Table 3.

4.3 PROPOSED ACTION AND ALTERNATIVES

4.3.1 EXISTING WETLANDS

The existing wetlands environment at the proposed project site, delineated as the Signature South Direct Study Area and the Signature East Direct Study Area, was assessed through field reconnaissance and through the review of

[7] For purposes of this analysis, major modifications was defined as requiring construction of new taxiways, relocating critical FAA navigational aids such as glide slope antennas or instrument landing systems, or would require extending utilities into portions of the airport currently lacking any utility infrastructure.

[8] For purposes of this analysis, reasonable to construct was defined as site disturbance of less than 10 acres for either Signature East or Signature South, as well as minimal demolition and relocation of existing facilities. Alternatives that would require site disturbance of more than 10 acres, significant demolition, or relocation of existing structures were considered to not be reasonable.

online data sources. **Table 4** provides a summary of USFWS and NJDEP wetlands present at the site, which are illustrated in **Exhibit 5** and **Exhibit 6**, respectively.

To determine the exact boundaries of the wetlands and adjacent areas, a delineation of wetlands and other aquatic resources was conducted in June 2024. A request for a Jurisdictional Determination (JD) with the USACE was made on February 13, 2024; on June 11, 2024, USACE issued a Preliminary JD (USACE File Number NAN-2024-00175-EMI) verifying the delineated aquatic resource limits. Jurisdictional wetlands within the Signature South Direct Study Area[9] and Signature East Direct Study Area are shown on **Exhibit 7** and **Exhibit 8**, respectively, and summarized in **Table 5**.

TABLE 4 USFWS AND NJDEP WETLANDS PRESENT AT THE PROPOSED PROJECT SITE

	FRESHWATER FORESTED WETLAND/SHRUB (ACRES)[1]		FRESHWATER EMERGENT WETLAND (ACRES)[2]		MANAGED WETLAND IN MAINTAINED LAWN GREENSPACE (ACRES)		TOTAL (ACRES)	
	USFWS	NJDEP	USFWS	NJDEP	USFWS[3]	NJDEP	USFWS	NJDEP
Signature East Direct Study Area	4.92	4.87	1.29	1.20	-	0.36	6.21	6.43
Signature South Direct Study Area	2.40	3.44	9.36	9.65	-	0	11.76	13.09

NOTES:
USFWS – United States Fish and Wildlife Service
NJDEP – New Jersey Department of Environmental Protection
1 Includes NJDEP wetland categories "deciduous wooded wetlands" and "deciduous scrub/shrub wetlands"
2 Includes NJDEP wetland categories "*Phragmites* dominated interior wetlands" and "herbaceous wetlands."
3 USFWS wetland categories do not include any category similar to "managed wetland in maintained lawn greenspace."
SOURCES: New Jersey Department of Environmental Protection, NJDEP Bureau of GIS, "Wetlands of New Jersey" (from Land Use/Land Cover 2021 Update), https://gisdata-njdep.opendata.arcgis.com/datasets/5a29ffe1eda24da5bd8e2a2297b90e24_2/explore?location= 40.850111%2C-74.060833%2C15.00 (accessed February 18, 2025).

[9] The potential development area south of Signature South (Alternative 6 Configuration 7) was not part of the jurisdictional delineation.



SOURCES: Nearmap, June 2024 (aerial photography – for visual reference only, may not be to scale); US Census Bureau, November 2023 (municipalities); Port Authority of New York and New Jersey, *Teterboro Airport, Airport Layout Plan*, December 2014 (Airport property boundary); US Fish and Wildlife Service, 2023 (wetlands); Ricondo & Associates, Inc., July 2025 (study areas).

NORTH 0 1,500 ft

EXHIBIT 5

USFWS WETLANDS IN THE GENERAL STUDY AREA

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh5_Wetlands_USFWS_2026_0925



SOURCES: Nearmap, June 2024 (aerial photography – for visual reference only, may not be to scale); US Census Bureau, November 2023 (municipalities); Port Authority of New York and New Jersey, *Teterboro Airport, Airport Layout Plan*, December 2014 (Airport property boundary); New Jersey Department of Environmental Protection, 2012 (wetlands); Ricondo & Associates, Inc., July 2025 (study areas).

NORTH 0 1,500 ft

EXHIBIT 6

NJDEP WETLANDS IN THE GENERAL STUDY AREA

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh6_Wetlands_NJDEP_2026_0820



SOURCES: Nearmap, June 2024 (aerial photography – for visual reference only, may not be to scale); US Census Bureau, November 2023 (municipalities); Princeton Hydro, November 2024 (wetlands); Ricondo & Associates, Inc., July 2025 (study areas).

EXHIBIT 7

JURISDICTIONAL WETLANDS IN THE SIGNATURE EAST DIRECT STUDY AREA

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh7_Wetlands_USACE_JD_East_2026_0820



SOURCES: Nearmap, June 2024 (aerial photography – for visual reference only, may not be to scale); US Census Bureau, November 2023 (municipalities); Princeton Hydro, November 2024 (wetlands); Ricondo & Associates, Inc., July 2025 (study areas).

NORTH 0 300 ft

EXHIBIT 8

JURISDICTIONAL WETLANDS IN THE SIGNATURE SOUTH DIRECT STUDY AREA

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh8_Wetlands_USACE_JD_South_2026_0820

TABLE 5 USACE DELINEATED WETLANDS

WETLAND	WETLAND CLASSIFICATION	USACE CLASSIFICATION	ACRES
Signature East Direct Study Area			
Wetland A	Palustrine Forested Wetland	PFO1E[1]	3.18
Wetland A	Palustrine Scrub-Shrub	PSS1E[2]	1.17
Wetland A	Palustrine Emergent *(Phragmites australis)* Wetland	PEM5E[3]	0.95
Wetland A	Palustrine Emergent Persistent Wetland	PEM1E[4]	0.01
Wetland A	Palustrine Emergent Persistent Wetland (Maintained Lawn)	PEM1E[4]	0.03
Wetland 0	Palustrine Forested Wetland	PFO1E[5]	0.01
Wetland 0A	Palustrine Forested Wetland	PFO1E[5]	0.01
Wetland 0B	Palustrine Forested Wetland	PFO1E[5]	0.01
Signature South Direct Study Area			
Wetland A	Palustrine Emergent Persistent Wetland (Maintained Lawn)	PEM1Jd[6]	1.83
Wetland A	Palustrine Emergent (*Phragmites australis)* Wetland	PEM5Jd[7]	6.79
Wetland A	Palustrine Forested Wetland	PFO1J[8]	3.93
	Total		**17.92**

NOTES:
USACE – US Army Corps of Engineers
1 PFO1E – Palustrine, Forested, Broad-Leaved Deciduous, Seasonally Flooded/Saturated
2 PSS1E – Palustrine, Scrub-Shrub, Broad-Leaved Deciduous, Seasonally Flooded/Saturated
3 PEM5E – Palustrine, Emergent, *Phragmites australis*, Seasonally Flooded/Saturated
4 PEM1E – Palustrine, Emergent, Persistent, Seasonally Flooded/Saturated
5 PFO1E – Palustrine, Forested, Broad-Leaved Deciduous, Seasonally Flooded/Saturated
6 PEM1Jd – Palustrine, Emergent, Persistent, Intermittently Flooded, Partially Drained/Ditched
7 PEM5Jd – Palustrine, Emergent, *Phragmites australis*, Intermittently Flooded, Partially Drained/Ditched
8 PFO1J – Palustrine, Forested, Broad-Leaved Deciduous, Intermittently Flooded
SOURCES: US Army Corps of Engineers, *Approved Jurisdictional Determination Request NAN-2024-00049-EMI by Signature Flight Support LLC – Signature South Expansion Project,* June 11, 2024; US Army Corps of Engineers, *Approved Jurisdictional Determination Request, NAN-2024-00175-EMI by Signature Flight Support, LLC – Signature East Expansion Project*, June 11, 2024.

4.3.2 WETLAND IMPACTS

Implementation of the Proposed Action or its action alternatives would impact USFWS, NJDEP, and USACE wetlands, as summarized in **Table 6**. During the development and evaluation of alternatives, Signature Aviation considered Executive Order 11990, *Protection of Wetlands*, and its requirement for Federal agencies to consider alternatives to wetland sites where practicable or to minimize the destruction or degradation if development within a wetland cannot be avoided. The majority of TEB that is not developed with airport improvements are constrained by *Phragmites*-dominated wetlands or forested wetlands. Therefore, any expansion at the Airport would result in impacts to wetland habitat and is unavoidable. However, Signature Aviation considered off-site alternatives that could avoid impacts to wetlands, including:

- The use of other modes of transportation (i.e., flights to other nearby commercial service airports, automobiles, buses, passenger trains, ferries, helicopters, etc.).

TABLE 6 WETLANDS IMPACTED BY ALTERNATIVES AND CONFIGURATIONS

	FRESHWATER FORESTED WETLAND/SHRUB (ACRES)			FRESHWATER EMERGENT WETLAND (ACRES)			MANAGED WETLAND IN MAINTAINED LAWN GREENSPACE			TOTAL (ACRES)		
	USFWS[1]	NJDEP[2]	USACE[3]	USFWS[4]	NJDEP[5]	USACE[6]	USFWS[7]	NJDEP[8]	USACE[9]	USFWS	NJDEP	USACE
Signature East												
Configuration 2	5.03	5.00	3.85	1.29	1.18	0.59	0.00	0.38	0.01	6.32	6.55	4.45
Configuration 3	4.85	4.70	3.85	1.29	1.18	0.59	0.00	0.38	0.01	6.14	6.26	4.45
Configuration 4	4.92	4.77	3.78	1.03	1.11	0.58	0.00	0.16	0.01	5.96	6.04	4.37
Configuration 5 (Proposed Action)	**3.98**	**3.90**	**3.22**	**1.26**	**1.16**	**0.59**	**0.00**	**0.35**	**0.01**	**5.24**	**5.41**	**3.82**
Signature South												
Configuration 2	2.12	2.83	3.40	8.63	8.68	6.68	0.00	0.00	1.30	10.75	11.50	11.38
Configuration 3	1.45	1.97	2.58	9.20	9.36	6.71	0.00	0.00	1.57	10.65	11.33	10.85
Configuration 4	0.64	1.14	1.58	7.68	8.19	6.48	0.00	0.00	1.20	8.32	9.33	9.27
Configuration 5	0.42	0.83	1.22	7.47	8.03	6.65	0.00	0.00	0.78	7.89	8.85	8.66
Configuration 6 (Proposed Action)	**0.28**	**0.45**	**0.89**	**6.22**	**6.81**	**5.78**	**0.00**	**0.00**	**0.41**	**6.50**	**7.26**	**7.08**
Configuration 7[10]	0.67	6.16	N/A	7.81	3.00	N/A	0.00	0.00	N/A	8.48	9.16	N/A

NOTES:

1 – Includes the following USFWS wetland categories: "freshwater forested / shrub wetland"

2 – Includes the following NJDEP wetland categories: "deciduous scrub / shrub" and "deciduous wooded wetlands"

3 – Includes the following USACE wetland categories: "palustrine forested wetland" and "palustrine scrub-shrub"

4 – Includes the following USFWS wetland categories: "freshwater emergent wetland"

5 – Includes the following NJDEP wetland categories: "herbaceous wetlands" and "*Phragmites* dominant wetlands"

6 – Includes the following USACE wetland categories: "palustrine emergent *Phragmites australis* wetland"

7 – The USFWS wetlands did not include a wetland category comparable to managed wetland in maintained lawn greenspace.

8 – Includes the following NJDEP wetland categories: "managed wetland in maintained lawn greenspace"

9 – Includes the following USACE wetland categories: "palustrine emergent persistent wetland"

10 – N/A or "Not Applicable" – a USACE delineation of wetland resources was not performed for Alternative 6 Configuration 7, which proposes to expand the Signature South boundary approximately 8.4 acres to the southwest.

SOURCES: Port Authority of New York and New Jersey, *Teterboro Airport, Airport Layout Plan*, December 2014; New Jersey Department of Environmental Protection, NJDEP Bureau of GIS, "Land Use/Land Cover of New Jersey 2020", https://gisdatanjdep.opendata.arcgis.com/datasets/2deaaa3cadd94166bdbff92a44ade284 _5/explore?location=40.847477%2C-74.057436%2C15.00 (accessed February 18, 2025); New Jersey Department of Environmental Protection, NJDEP Bureau of GIS, "Wetlands of New Jersey" (from Land Use/Land Cover 2021 Update), https://gisdata-njdep.opendata.arcgis.com/datasets/5a29ffe1eda24da5bd8e2a2297b90e24 _2/explore?location=40.850111%2C-74.060833%2C15.00 (accessed February 18, 2025); US Army Corps of Engineers, *Approved Jurisdictional Determination Request NAN-2024-00049-EMI by Signature Flight Support LLC – Signature South Expansion Project,* June 11, 2024; US Army Corps of Engineers, *Approved Jurisdictional Determination Request, NAN-2024-00175-EMI by Signature Flight Support, LLC – Signature East Expansion Project,* June 11, 2024. Ricondo & Associates, Inc., July 2026.

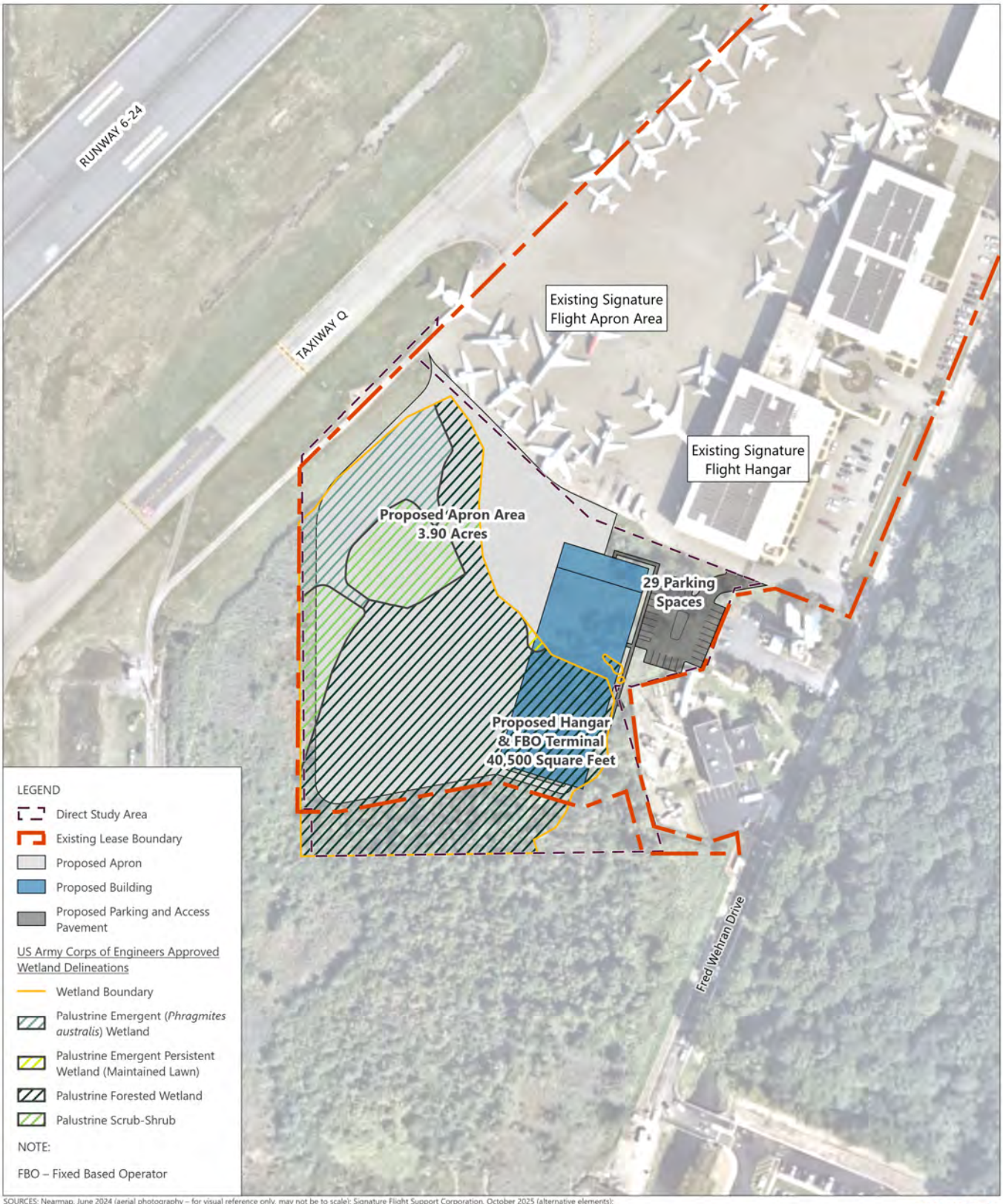
- Use of other existing airports alternatives [i.e., nearby commercial service and general aviation airports, including: John F. Kennedy International Airport (JFK); Newark Liberty International Airport (EWR); New York Stewart International Airport (SWF); LaGuardia Airport (LGA); Republic Airport (FRG); Westchester County Airport (HPN); and Morristown Municipal Airport (MMU)].

While these alternatives would avoid wetland impacts by eliminating the need for on-Airport development, they were dismissed as not practical or feasible and also do not meet the Purpose and Need under Screening Step 1. Specifically, alternative modes of transportation were found to be inadequate due to the nature and breadth of operations to and from the Airport. These alternatives lack the flexibility, convenience, and efficiency of TEB and private aviation, particularly for passengers traveling to and from various locations in the New York City metropolitan area. In many cases, such options are simply not viable. Further, based on existing federal grant obligations and federal law, the Port Authority, as owner and operator of TEB, does not have the authority to restrict aircraft operations or force customers to use other modes of transportation. Similarly, the use of other existing airports was deemed infeasible. Neither the FAA, the Port Authority, nor Signature Aviation has the authority to dictate which airport passengers or pilots must use. Travel to and from Manhattan is ultimately determined by passenger preference and TEB is the airport that pilots and their passengers choose to fly in and out of when traveling to Manhattan. Even if aircraft were based at nearby commercial service or general aviation airports, this would not reduce ferry flights, as TEB remains the primary destination for passengers. Additionally, as with other modes of transportation, based on existing federal grant obligations and federal law, the Port Authority, as owner and operator of TEB, does not have the authority to restrict aircraft operations or force pilots to operate at other airports.

In addition to the off-site alternatives that would entirely avoid impacts to wetlands, Signature Aviation also considered other on-Airport locations as well as multiple alternative configurations at both Signature East and Signature South to minimize overall impacts to wetlands and, in particular, impacts on high quality wetlands, specifically freshwater/forested wetlands/shrubs (i.e., palustrine forested).

Two undeveloped areas on Airport property (not already being considered) were identified as potentially large enough to accommodate additional FBO facilities. However, the development of either of these sites would require extensive airfield improvements (i.e., taxiways) and would require frequent and unnecessary runway crossings that could impact airfield operations and potentially increase safety risks. Furthermore, wetlands are present at both identified sites, meaning that development of either of the sites would not avoid impacts to wetlands.

Signature Aviation also considered multiple site layout options at both Signature East and Signature South in order to minimize overall wetland impacts as well as impacts to palustrine forested wetlands. Although complete avoidance of wetland resources was not feasible at either site due to physical constraints, operational requirements, and the overall project purpose and need, the selected site configurations for the Proposed Action represent the alternatives with the least amount of wetland impacts, particularly to high-quality wetland areas. Impacts to USACE and NJDEP wetlands associated with the Proposed Action at Signature East are shown on **Exhibit 9** and **Exhibit 10**, respectively. Impacts to USACE and NJDEP wetlands associated with the Proposed Action at Signature South are shown on **Exhibit 11** and **Exhibit 12**, respectively.



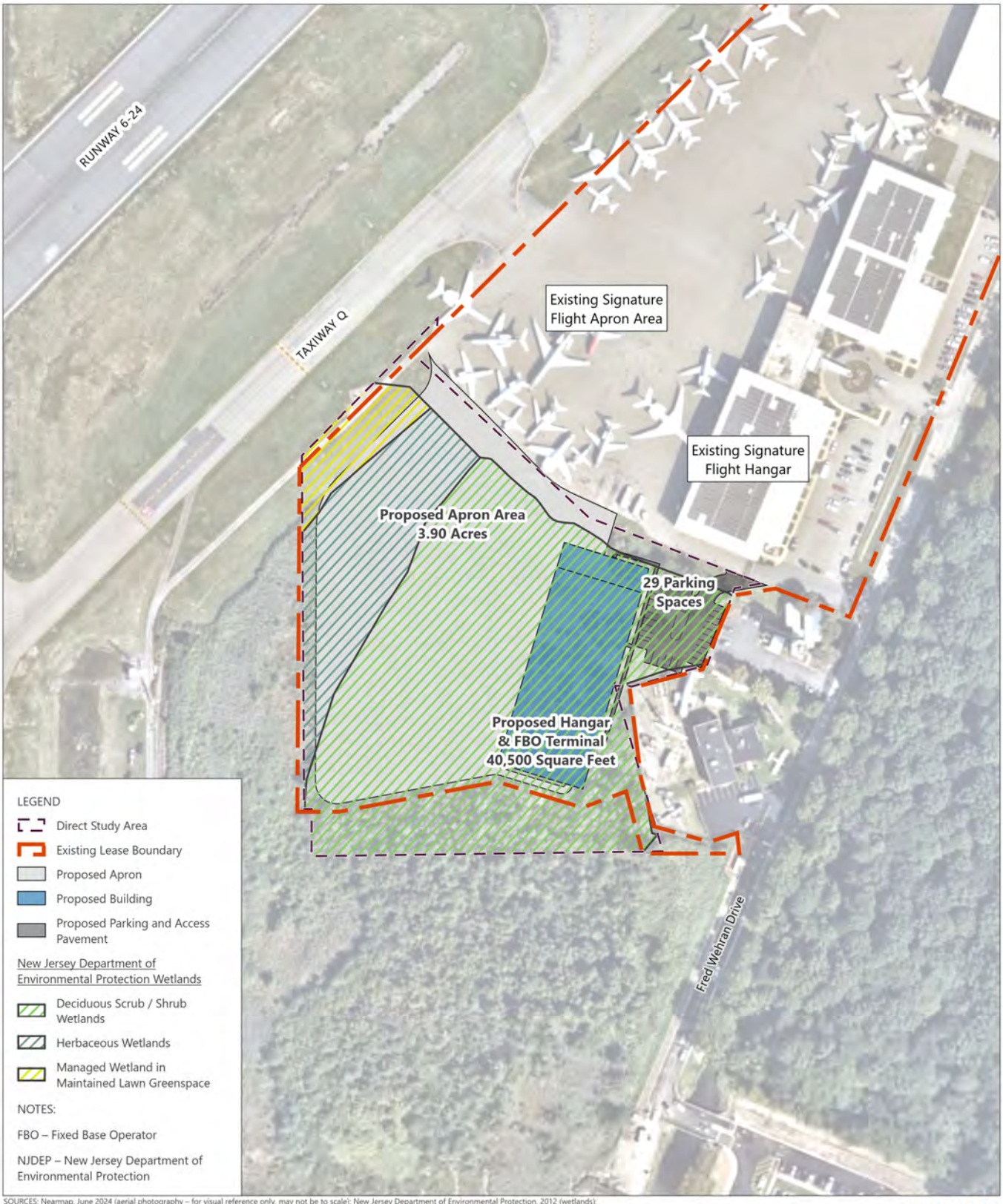
SOURCES: Nearmap, June 2024 (aerial photography – for visual reference only, may not be to scale); Signature Flight Support Corporation, October 2025 (alternative elements); Signature Flight Support Corporation, December 2025 (existing lease boundary); Princeton Hydro, November 2024 (wetlands); Ricondo & Associates, Inc., July 2025 (study area).

EXHIBIT 9

SIGNATURE EAST PROPOSED ACTION IMPACTS TO JURISDICTIONAL WETLANDS

NORTH 0 200 ft

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh9_WetlandsAndElements_USACE_JD_East_2026_0820



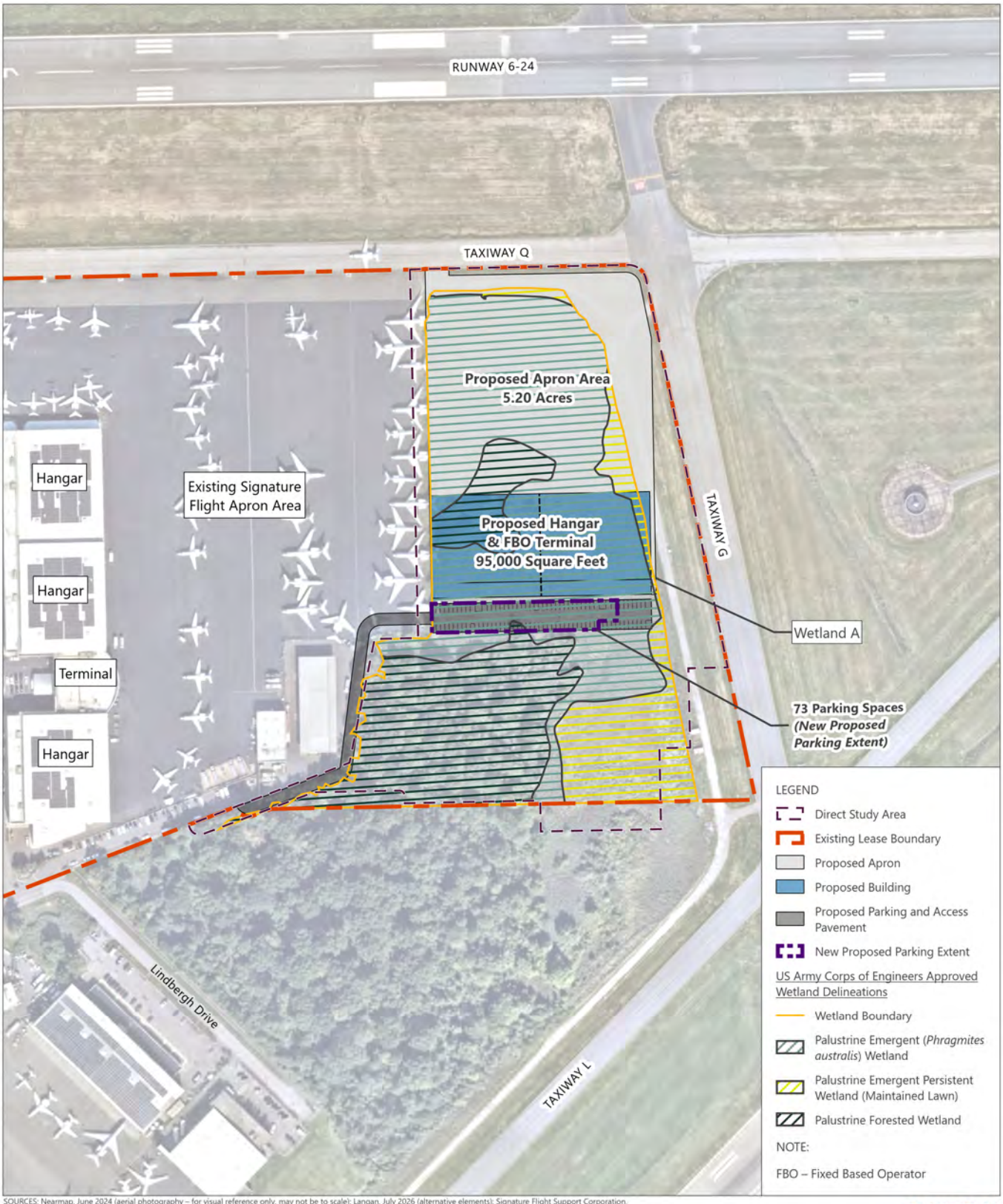
SOURCES: Nearmap, June 2024 (aerial photography – for visual reference only, may not be to scale); New Jersey Department of Environmental Protection, 2012 (wetlands); Signature Flight Support Corporation, October 2025 (alternative elements); Signature Flight Support Corporation, December 2025 (existing lease boundary); Ricondo & Associates, Inc., July 2025 (study area).

NORTH 0 200 ft

EXHIBIT 10

SIGNATURE EAST PROPOSED ACTION IMPACTS TO NJDEP WETLANDS

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh10_WetlandsAndElement_NJDEP_East_2026_0820



SOURCES: Nearmap, June 2024 (aerial photography – for visual reference only, may not be to scale); Langan, July 2026 (alternative elements); Signature Flight Support Corporation, December 2025 (existing lease boundary); Princeton Hydro, November 2024 (wetlands); Ricondo & Associates, Inc., July 2025 (study area).

NORTH 0 300 ft

EXHIBIT 11

SIGNATURE SOUTH PROPOSED ACTION IMPACTS TO JURISDICTIONAL WETLANDS

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh11_WetlandsAndElements_USACE_JD_South_2026_0820



SOURCES: Nearmap, June 2024 (aerial photography – for visual reference only, may not be to scale); Signature Flight Support Corporation, October 2025 (alternative elements); Signature Flight Support Corporation, December 2025 (existing lease boundary); Princeton Hydro, November 2024 (wetlands); Ricondo & Associates, Inc., July 2025 (study area).

NORTH 0 300 ft

EXHIBIT 12

SIGNATURE SOUTH PROPOSED ACTION IMPACTS TO NJDEP WETLANDS

Project: P:\GIS\Projects\TEB\APRX\TEB_FacilitiesRedevEA_AppendixK_404b1Analysis_2026_0804.aprx Layout: TEB_Section404b1_Exh12_WetlandsAndElement_NJDEP_South_2026_0820

As discussed in the 1990 Memorandum of Agreement on the mitigation requirements of the Guidelines, mitigation types are typically applied sequentially in the following order: Avoidance, Minimization, Compensatory Mitigation. The following discussion highlights how the proposed project satisfies the Clean Water Act Section 404 requirements as it relates to mitigation.

4.3.2.1 AVOIDANCE

It is understood that there is a rebuttable presumption that there is a non-wetland alternative available for non-water dependent activities; however, an alternative that expands the existing Airport facilities without impacts to wetlands is not available. Any undeveloped land where expansion of existing facilities is possible is predominantly comprised of wetland.

4.3.2.2 MINIMIZATION

As presented herein, the alternatives developed were subject to multiple iterations, with the selected alternatives for both South and East representing (1) the least amount of proposed impacts to wetlands, and (2) avoiding the highest quality wetlands present to the extent practicable (see Table 6). For example, earlier alternatives for Signature South included impacts to forested wetlands that are not within the Airport's maintenance footprint where trees are topped for line of sight. Refinements of the configuration eliminated impacts to forested wetlands where maintenance activities do not occur. As impacts to wetlands are not avoidable, the design progressed through multiple iterations resulting in a design that (1) avoids impacts to wetlands to the maximum extent practicable and (2) minimizes impacts to existing wetlands associated with both the South and East expansion, as shown in Table 6.

4.3.2.3 MITIGATION

As impacts to wetlands are unavoidable, the preferred alternatives went through multiple iterations resulting in a configuration that (1) minimizes impacts to wetlands to the maximum extent practicable and (2) only proposes impacts to wetlands that fall within the Airport's prescribed maintenance regime. As such, compensatory mitigation is required. Off-site wetlands mitigation would be performed to compensate for the on-site wetland impacts, as there are no suitable sites on Airport property, nor would FAA allow wetland mitigation to occur within close proximity to TEB runways or aircraft movement areas.[10] Signature has identified the following mitigation sites, as detailed below and shown on Exhibit 3:

- 6.79 acres of PEM wetland impacts would be mitigated through the use of 6.56 credits purchased at the Kane Wetland Mitigation Bank and 0.23 credits purchased at the MRI-3 (Evergreen) Mitigation Bank.
- 0.68 acres of palustrine scrub-shrub wetland impacts would be mitigated through the purchase of 0.68 credits at the MRI-3 (Evergreen) Mitigation Bank.
- 3.43 acres of palustrine forested wetland impacts would be mitigated through the purchase of 3.43 credits at the Upper Penhorn Creek Mitigation Bank located at the Guarini Tract.[11] GreenVest is in the process of obtaining final signatures from the USACE and NJDEP regarding the Upper Penhorn Creek Mitigation Bank's approval. If the Upper Penhorn Creek Mitigation Bank is not formally approved prior to receipt of a Section 404 permit,

[10] US Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5200-33C, *Hazardous Wildlife Attractants on or near Airports*, February 21, 2020. For airport serving turbine-powered aircraft, FAA recommends a separation distance of 10,000 feet from the aircraft operations area and wetlands.

[11] GreenVest has applied to establish the Upper Penhorn Creek Mitigation Bank at the Guarini Tract located in the Township of North Bergen, Hudson County, New Jersey. The Upper Penhorn Creek Mitigation Bank is currently being reviewed by the Meadowlands Interagency Mitigation Advisory Committee, which consists of representatives from USACE, NJDEP, USEPA, USFWS, NOAA, and NJSEA.

Signature has agreements in place with GreenVest to use the Guarini Tract as a "turnkey"[12] mitigation site that would enhance 10.29 acres of degraded palustrine forested wetlands within the limits of the proposed mitigation bank. GreenVest will secure the necessary local, State, and Federal licenses, permits, approvals, and consents required to perform compensatory mitigation at this site.

With implementation of these mitigation measures, impacts to wetlands associated with the Proposed Action would be mitigated and compensated for in accordance with the CWA Section 404(b)(1) as administered by the USACE, as well as in accordance with Executive Order 11990, *Protection of Wetlands*, and US DOT Order 5660.1A, *Preservation of the Nation's Wetlands*.

[12] A "turnkey" mitigation approach refers to a ready-to-implement compensatory mitigation package. Under this approach, GreenVest would develop the required mitigation plan, obtain applicable permits and regulatory approvals, implement the approved mitigation measures, and conduct the required monitoring and maintenance necessary to demonstrate that applicable performance standards and mitigation requirements have been satisfied.