APPENDIX Q

Comment Responses

TABLE OF CONTENTS

Introduction **3**

1. Public Comment Period **3**

2. Approach to Comment Responses **4**

3. Index of Commenters **5**

4. Comment Responses **11**

Topical Responses 12

TR-1 Airport Benefits 12

TR-2 Airport Use and Flight Restrictions 13

TR-3 Accommodation of Aircraft Activity 13

TR-4 Purpose and Need 15

TR-5 Reduction of Ferry Flights 16

TR-6 Alternatives to Avoid Impacts 16

TR-7 No Action Alternative 18

TR-8 Aviation Emissions and Air Quality 19

TR-9 Biological Resources 20

TR-10 Noise and Noise-Compatible Land Use 22

TR-11 Water Resources – Floodplains 23

TR-12 Water Resources – Wetlands 24

TR-13 Water Resources – Surface Waters 26

TR-14 Environmental Justice/Climate Change 27

TR-15 Cumulative Effects 27

TR-16 General Project Support 28

TR-17 General Opposition or Concern 29

Individual Responses 30

AF001 US Fish and Wildlife Service 30

AF002 US Environmental Protection Agency 30

AF003 US Army Corps of Engineers 33

AS001 New Jersey Department of Environmental Protection 34

EO001 Township of South Hackensack 35

EO002 Mayor and Council of Borough of Little Ferry 37
LO002 Regional Plan Association 39
LO004 Hackensack Riverkeeper 46
LO006 Teaneck Creek Conservancy 59
PC001 Dhulipala, Nancy 61
PC005 Laverty, Tammy 67
PC027 Hackensack Environmental Commission and Green Team 67
PC037 Hackensack Environmental Justice Alliance 71
PC060 Young, Karen 73
PC086 Kieras, Conrad 82
PC136 Tsui, Winnie 98
PC150 Longo, Patricia 100

LIST OF TABLES

Table 1 Draft Environmental Assessment Comment Submissions 5
Table 2 Commenter Index 6
Table 3 Draft Environmental Assessment Comment Response Topics 11

INTRODUCTION

Signature Flight Support (Signature) and the Port Authority of New York and New Jersey (the Port Authority) prepared this Environmental Assessment (EA) in accordance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S.C. §§ 4321 et seq.), following published guidance in US Department of Transportation (DOT) Order 5610.1D, *Procedures for Considering Environmental Impacts*,[1] Federal Aviation Administration (FAA) Order 1050.1G, *FAA National Environmental Policy Act Implementing Procedures*,[2] FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*,[3] and their respective desk references.[4,5] Although FAA Order 1050.1G does not require public review of every Environmental Assessment, it provides the FAA discretion to make a Draft EA available for public review when appropriate. In coordination with the FAA, Signature and the Port Authority elected to make the Draft EA for the Facilities Redevelopment Project (Proposed Action) at Teterboro Airport (TEB or the Airport) available for public review.

This appendix documents the comments received on the Draft EA, describes the methodology used to develop responses to those comments, and provides responses to each comment submitted during the public review period.

1. PUBLIC COMMENT PERIOD

The Draft EA for the Proposed Action at TEB was made available for public comment for a period of 31 days, from May 29, 2026, to 5:00 PM Eastern Time on June 29, 2026. The Notice of Availability (NOA) announcing the public availability of the Draft EA and the start of the comment period was published on May 29, 2026, in the following newspapers: *The Star-Ledger*, *The Herald News*, and *northjersey.com*. Additionally, notices announcing the availability of the Draft EA and the start of the comment period were distributed to interested parties via email and were posted on the Port Authority's website at www.panynj.gov/studies-reports. Please see Appendix P for more information on notices of the Draft EA.

The notices also included information regarding the date, time, and location of the public workshop, which was held during the comment period on June 17, 2026. The workshop featured informational display boards and was staffed by project personnel who were available to answer questions regarding the Proposed Action. Attendees were also provided with the opportunity to submit formal written comments or provide verbal comments to a stenographer for inclusion in the public record. Copies of the notices and public workshop materials are provided in Appendix P of the EA.

The Draft EA was made available for review on the Port Authority's website, at the TEB Manager's Office, and at the Bergen County Clerk's Office. Written and verbal comments on the Draft EA were accepted throughout the public

[1] U.S. Department of Transportation, Order 5610.1D, *Procedures for Considering Environmental Impacts*, July 1, 2025.

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

[3] U.S. Department of Transportation, Federal Aviation Administration, Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*, April 28, 2006.

[4] U.S. Department of Transportation, Federal Aviation Administration, *1050.1 Desk Reference*, Version 4, September 2023. The 1050.1 Desk Reference may be cited only as a reference for the guidance it contains and not as a source of requirements under laws, regulations, or other authorities Id., § I.1.

[5] U.S. Department of Transportation, Federal Aviation Administration, *Environmental Desk Reference for Airport Actions*, October 2007.

review period. Comments could be submitted via email[6] and mail[7] during the comment period. In addition, comments could be submitted at the public workshop, where comment forms were available for written submissions and a stenographer was present to transcribe verbal comments.

Signature and the Port Authority encouraged all interested parties to provide comments on the scope and content of the Draft EA. Commenters were requested to be as specific as possible and to address the analysis of potential environmental impacts, the adequacy of the Proposed Action, the merits of the alternatives considered, and any proposed mitigation measures.

The Port Authority received a total of 178 comment submissions[8] on the Draft EA,[9] comprising letters, emails, and verbal statements. Of these, 168 were submitted during the published comment period and 10 were submitted within the following two weeks after the closure of the published comment period (5:00 p.m. Eastern Time on June 29, 2026). The FAA consents to include the comment letters received within the two weeks after the published comment period close. Comments received after that date were reviewed to ensure that any issues identified in the comments were addressed in the responses below, but those comment letters are not included in this appendix. Written comments were received from 3 federal agencies, 1 state agency, 3 elected officials, and 7 local organizations. In addition, 164 submissions were received from members of the public via email, mail, or at the public workshop. There were 38 people that attended the public workshop and 14 individuals submitted comments during the public workshop.

2. APPROACH TO COMMENT RESPONSES

All comments received on the Draft EA were reviewed and considered. The comments were categorized and grouped according to commenter and topic. This enabled the efficient preparation of responses to similar comments and reduced repetition in this comment response section. The Unique Comment ID consists of letters indicating the commenter category and a number for the comment. The commenter category is as follows:

- AF – Federal Agency
- AS – State Agency
- EO – Elected Officials
- LO – Local Organization
- PC – Public Commenter
- PW – Public Workshop

Table 1 provides the number of comments according to the commenter category.

[6] Comments were accepted by emailing TEBEA@panynj.gov.

[7] Written comments were accepted by mailing: Madelyn Sheehan of the Port Authority, 2 Montgomery Street, Floor 5, Jersey City, NJ, 07306.

[8] A comment submission is defined as an instance of an individual expressing thoughts on the Proposed Action via written or oral media. A single comment submission may include statements on many topics.

[9] The total number of comment submissions is inclusive of duplicate and repetitive comment submissions from the same individuals. Additionally, some commenters submitted "corrected" comments to replace earlier submissions; at the request of the commenters, the "draft" comment submissions are not included in this appendix.

TABLE 1 DRAFT ENVIRONMENTAL ASSESSMENT COMMENT SUBMISSIONS

CATEGORY	NUMBER OF COMMENTS
Federal Agency (AF)	3
State Agency (AS)	1
Elected Official (EO)	3
Local Organization (LO)	7
Public Commenter (PC)	150
Public Workshop (PW)	14
Total Number of Draft EA Comments	**178**

NOTE:
EA – Environmental Assessment
SOURCE: Ricondo & Associates, Inc., September 2026.

In coordination with the FAA and subject matter experts, each comment received on the Draft EA was reviewed and responses were prepared. Individual responses were developed for comments submitted by federal and state agencies, elected officials, and local organizations. Individual responses were also prepared for technical and detailed comments submitted by members of the public. These individual responses are provided under *Individual Responses* in Section 4 of this appendix.

The majority of comments submitted by members of the public were brief, addressed similar issues, or did not raise technical concerns requiring individual responses; instead, topical responses were developed for the most common issues identified during review of the comments. These topical responses address the common issues raised in the public comments and are provided under *Topical Responses* in Section 4 of this appendix. Each public comment has been assigned one or more topical response number, as applicable.

Each response has been assigned a unique number to assist readers in locating the corresponding response(s) to a comment. Responses have also been cross-referenced, where appropriate, to minimize redundancy. Responses were prepared only for comments relevant to the Proposed Action and the NEPA process.

Where comments resulted in revisions to the Final EA, the corresponding response identifies the modification and references the applicable section of the EA where the revision can be found. Revisions made to the Final EA are shown in underlined text to facilitate identification of changes in the document.

3. INDEX OF COMMENTERS

To assist the reader's review and use of responses to comments, an index encompassing both written and verbal comments is provided in **Table 2**. This index provides the Unique Comment ID, commenter name, affiliation (that is, name of agency or organization that the author represents), if applicable, and date of each comment submission. The index is organized by category and lists all of the comment submissions alphabetically by the commenter's last name so that commenters can easily locate where their issues are addressed further in this appendix. The "Response(s)" column indicates where the individual response(s) for each comment submission can be found in this appendix.

Commenters were notified that any personal identifying information included as part of their comment submission could be made publicly available at any time. Signature and the Port Authority have made best efforts to

accommodate requests to withhold personal identifying information; however, accommodation of these requests cannot be guaranteed.

TABLE 2 COMMENTER INDEX

COMMENTER	ID NUMBER	AFFILIATIONS/AGENCIES	DATE	RESPONSE(S)
Federal Agency (AF)				
Andersen, Troy M.	AF001	US Fish and Wildlife Service, New Jersey Field Office	2026-07-02	AF001
Austin, Mark	AF002	US Environmental Protection Agency, Region 2	2026-07-01	AF002
Kocsik, Zachary	AF003	US Army Corps of Engineers, New York District	2026-06-29	AF003
State Agency (AS)				
Ryan, Carter	AS001	New Jersey Department of Environmental Protection	2026-06-29	AS001
Elected Officials (EO)				
Brugger, Gary C.	EO001	Township of South Hackensack	2026-06-25	TR-1; TR-11; TR-13; TR-14
Ragueso, Mauro [1]	EO002	Mayor and Council of the Borough of Little Ferry	2026-06-29	TR-8; TR-10; TR-11; TR-12; TR-13; TR-14; TR-15
Schaer, Gary S.	EO003	New Jersey General Assembly, 36th District	2026-06-25	TR-1; TR-4; TR-5; TR-13; TR-14; TR-16
Local Organizations (LO)				
Alvarado, John R.	LO001	International Union of Operating Engineers Local 825	2026-06-16	TR-4; TR-5; TR-13; TR-14; TR-16
Baldwin, Zoe	LO002	Regional Plan Association	2026-06-29	TR-1; TR-3; TR-4; TR-6; TR-9; TR-11; TR-12; TR-13; TR-15
Kirkos, Jim	LO003	Meadowlands Chambers	2026-06-25	TR-1; TR-3; TR-4; TR-12; TR-13; TR-14; TR-16
Sheehan, Bill	LO004	Hackensack Riverkeeper	2026-06-29	TR-1; TR-4; TR-6; TR-8; TR-9; TR-11; TR-12; TR-13; TR-14; TR-15; TR-17
Sullivan, Thomas J.	LO005	Bergen County Building and Construction Trades Council	2026-06-16	TR-1; TR-4; TR-13; TR-14; TR-16
	LO006	Teaneck Creek Conservancy	2026-06-29	TR-9; TR-12; TR-13; TR-14; TR-17
Keenan, Gerald	LO007	NJ Alliance for Action	2026-07-01	TR-1; TR-4; TR-5; TR-11; TR-13; TR-16
Public Commenters (PC)				
Abramson, Alexis	PC061		2026-06-26	TR-1; TR-4; TR-6; TR-9; TR-11; TR-12; TR-13; TR-15; TR-17
Androski, Nina	PC016		2026-06-20	TR-4; TR-6; TR-9; TR-11; TR-12; TR-13; TR-17
Anyel, Robyn	PC062		2026-06-26	TR-9; TR-12
Bach, Nadia	PC003		2026-06-18	TR-9; TR-11; TR-12; TR-13; TR-17
Beck, Kelbe	PC079		2026-06-28	TR-4; TR-9; TR-10; TR-11; TR-12; TR-13; TR-17
Benim, Marilynn	PC092		2026-06-29	TR-1; TR-4; TR-11; TR-12; TR-14
Benim, Thomas E.	PC080		2026-06-28	TR-12; TR-15
Berkovits, Edna	PC081		2026-06-28	TR-9; TR-11; TR-12; TR-13
Berton, Kate	PC041		2026-06-23	TR-9; TR-11; TR-12; TR-13; TR-17
Beukelaer, Kenny	PC055		2026-06-25	TR-4
Blaurock, Lise	PC093		2026-06-29	TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14
Bolles, Michael	PC008		2026-06-19	TR-9; TR-11; TR-12
Bowerman, Esti	PC049		2026-06-24	TR-1; TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Braylock, Miriam	PC017		2026-06-20	TR-3; TR-8; TR-10; TR-11; TR-12; TR-17
Broekman, Han	PC042		2026-06-23	TR-1; TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Bruno, Theresa	PC063		2026-06-26	TR-1; TR-10; TR-17

COMMENTER	ID NUMBER	AFFILIATIONS/AGENCIES	DATE	RESPONSE(S)
Burzinski	PC148		2026-07-09	TR-8; TR-9; TR-10; TR-12; TR-17
Carcione, Tracy	PC009		2026-06-19	TR-1; TR-4; TR-9; TR-10; TR-11; TR-12; TR-13; TR-17
Caron, Jessica	PC147		2026-07-05	TR-9; TR-12; TR-13; TR-17
Casagrande, Margaret	PC010		2026-06-19	TR-9; TR-11; TR-12
Cervone, Ann	PC082		2026-06-28	TR-3; TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-15
Chambers, Juan	PC094		2026-06-29	TR-1; TR-9; TR-11; TR-13; TR-14
Chambers, Juan	PC095		2026-06-29	TR-1; TR-9; TR-11; TR-13; TR-14
Cioffi, Annika	PC018		2026-06-20	TR-9; TR-12
Cohen, Vicki	PC028		2026-06-21	TR-10; TR-11; TR-12; TR-15; TR-17
Cosentino, Thomas	PC064		2026-06-26	TR-2; TR-4; TR-5; TR-10; TR-12; TR-17
Coughlin, Sharon	PC073		2026-06-27	TR-2; TR-4; TR-9; TR-11; TR-12; TR-13; TR-17
Cruz, Maya	PC019		2026-06-20	TR-9; TR-11; TR-12; TR-13
Cuomo, Pietro	PC096	Aircraft Services Group, Inc	2026-06-29	TR-16
D'Anna, Marie	PC097		2026-06-29	TR-9; TR-11; TR-12; TR-17
Davol, Sarah	PC065		2026-06-26	TR-12
Del Vechio, Pedra	PC037	Hackensack Environmental Justice Alliance	2026-06-22	PC037
Demarco, Debbie	PC056		2026-06-25	TR-9; TR-13
Detyna, Joan	PC098		2026-06-29	TR-9; TR-12; TR-17
Dhulipala, Nancy	PC001		2026-06-17	PC001
DiRoma, Patrick	PC083		2026-06-28	TR-1; TR-4; TR-10; TR-17
Donaldson, Jad	PC066	Charter Communications	2026-06-26	TR-16
Fahey, Maryann	PC099		2026-06-29	TR-3; TR-4; TR-10; TR-12; TR-17
Fahey, William	PC100		2026-06-29	TR-1; TR-4; TR-8; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Faulkner, Eric A.	PC050	InLine Aviation Group, LLC.	2026-06-24	TR-16
Fiorey, Nicola	PC101		2026-06-29	TR-1; TR-4; TR-11; TR-12; TR-13; TR-17
Gagliardi, Gary	PC102		2026-06-29	TR-1; TR-10; TR-12; TR-14; TR-15; TR-17
Galindo, Nicolas	PC020		2026-06-20	TR-9; TR-11; TR-12; TR-13; TR-17
Ghahary, Darius	PC142		2026-06-30	TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-15
Giotta, Madeline	PC011		2026-06-19	TR-9; TR-11; TR-12; TR-17
Gladis, Fred	PC084		2026-06-28	TR-8; TR-10; TR-14; TR-17
Guardino, Loretta	PC067		2026-06-26	TR-1; TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-15; TR-17
Hall, Candy	PC103		2026-06-29	TR-9; TR-12; TR-13; TR-17
Hall, Laura	PC085		2026-06-28	TR-4; TR-10; TR-17
Haymes, Bradley	PC074		2026-06-27	TR-1; TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-14; TR-15; TR-17
Haymes, Valerie	PC029		2026-06-21	TR-4; TR-9; TR-11; TR-12; TR-13; TR-17
Hickey, Kathryn	PC068		2026-06-26	TR-4; TR-9; TR-11; TR-12; TR-13; TR-14; TR-17
Hook, Adam	PC069	NetJets	2026-06-26	TR-4; TR-16
Infield, Tracy	PC104		2026-06-29	TR-1; TR-11; TR-12; TR-13; TR-17
Insalaco, Jamie	PC105		2026-06-29	TR-10; TR-17
Keim, Donald	PC106		2026-06-29	TR-11; TR-14; TR-17
Kieras, Conrad	PC086		2026-06-28	PC086

COMMENTER	ID NUMBER	AFFILIATIONS/AGENCIES	DATE	RESPONSE(S)
Kieras, Tadeusz	PC107		2026-06-29	TR-11; TR-12; TR-13; TR-17
Kieras, Teresa	PC108		2026-06-29	TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Koenig, Eric	PC109		2026-06-29	TR-1; TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Koenig, Eric	PC110		2026-06-29	TR-1; TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Koutsopanagos, Demetrios	PC111	Eagle Aircraft & Transportation Management, Inc.	2026-06-29	TR-4; TR-5; TR-16
Kurland, Cheryl	PC112		2026-06-29	TR-1; TR-9; TR-12; TR-17
Laborce, Gerry	PC143	TISMA Inc.	2026-06-30	TR-16
LaTour, Gary	PC012		2026-06-19	TR-8; TR-9; TR-11; TR-12; TR-13; TR-17
Laverty, Tammy	PC004		2026-06-18	TR-9; TR-11; TR-12
Laverty, Tammy	PC005		2026-06-18	PC005
Laverty, Tammy	PC030		2026-06-21	TR-1; TR-9; TR-11; TR-12; TR-17
Leitner, Annmarie	PC031		2026-06-21	TR-9; TR-12; TR-17
LeMaire, Jim	PC021		2026-06-20	TR-1; TR-4; TR-9; TR-10; TR-11; TR-12; TR-13; TR-17
Leon, Lucille	PC113		2026-06-29	TR-8; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Leone, Veronica	PC043		2026-06-23	TR-1; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Lesso, Loreen	PC087		2026-06-28	TR-9; TR-11; TR-12; TR-13; TR-17
Loar, Rosemary	PC038		2026-06-22	TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-17
Longo, Patricia	PC057		2026-06-25	TR-1; TR-9; TR-11; TR-12; TR-14; TR-17
Longo, Patricia	PC150		2026-06-23	TR-9; TR-11
Lucca, Pam	PC144		2026-06-30	TR-12; TR-17
Maghici, Sorana	PC114		2026-06-29	TR-9; TR-12; TR-17
Massler, Jessica	PC115		2026-06-29	TR-9; TR-11; TR-12; TR-13; TR-14; TR-17
Matsui, Mary	PC070		2026-06-26	TR-9; TR-11; TR-12; TR-13; TR-17
Mayland, Erin Benim	PC032		2026-06-21	TR-1; TR-8; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Mayland, Nathan	PC033		2026-06-21	TR-1; TR-4; TR-8; TR-10; TR-11; TR-12; TR-13; TR-17
McIntosh, Marcia	PC022		2026-06-20	TR-8; TR-9; TR-10; TR-12; TR-17
McKim, Judith	PC116		2026-06-29	TR-12; TR-17
Mead, Dennis	PC117		2026-06-29	TR-4; TR-9; TR-11; TR-12; TR-13; TR-14; TR-17
Mead, Gina	PC118		2026-06-29	TR-4; TR-9; TR-11; TR-12; TR-13; TR-17
Mei, Linda	PC044		2026-06-23	TR-1; TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Meko, Patricia M	PC013		2026-06-19	TR-12; TR-17
Mele, Lori	PC119		2026-06-29	TR-4; TR-8; TR-9; TR-10; TR-12; TR-14; TR-17
Meyer, Erin Benim	PC075		2026-06-27	TR-4; TR-9; TR-11; TR-12; TR-13; TR-17
Miller, Alexis	PC051		2026-06-24	TR-1; TR-4; TR-9; TR-11; TR-12; TR-13; TR-17
Mills, John	PC120		2026-06-29	TR-8; TR-9; TR-10; TR-11; TR-12; TR-14; TR-17
Moldowan, Brent	PC121	Priester Aviation	2026-06-29	TR-4; TR-5; TR-16
Monesteri, Denise	PC045		2026-06-23	TR-4; TR-9; TR-12; TR-17
Monesteri, Denise	PC046		2026-06-23	TR-4; TR-8; TR-10; TR-11; TR-12; TR-15; TR-17
Monesteri, Faith	PC047		2026-06-23	TR-4; TR-8; TR-10; TR-11; TR-12; TR-15; TR-17

COMMENTER	ID NUMBER	AFFILIATIONS/AGENCIES	DATE	RESPONSE(S)
Moody, Kathryn	PC023		2026-06-20	TR-4; TR-12; TR-17
Moore, Ian	PC122		2026-06-29	TR-2; TR-3; TR-4; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Moore, Natalia	PC123		2026-06-29	TR-1; TR-4; TR-11; TR-12; TR-13; TR-14; TR-15; TR-17
Moore, Scott	PC088	Jet Aviation	2026-06-28	TR-16
Muller, George	PC052		2026-06-24	TR-1; TR-4; TR-9; TR-10; TR-11; TR-12; TR-13; TR-17
Muller, George	PC053		2026-06-24	TR-1; TR-4; TR-9; TR-10; TR-11; TR-12; TR-13; TR-17
Murray, Sandeep	PC089		2026-06-28	TR-6; TR-9; TR-11; TR-12; TR-13; TR-15; TR-17
Nickeson, Karen	PC039		2026-06-22	TR-1; TR-4; TR-9; TR-11; TR-12; TR-13; TR-14; TR-17
Niland, Denis	PC124		2026-06-29	TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-15; TR-17
O'Connor, Julie	PC076		2026-06-27	TR-9; TR-11; TR-12; TR-17
Olsen, Vera	PC034		2026-06-21	TR-1; TR-9; TR-11; TR-12; TR-17
O'Reilly, Aidan	PC048		2026-06-23	TR-11; TR-12; TR-13; TR-17
Oriente, Nicole	PC058		2026-06-25	TR-4; TR-9; TR-11; TR-12; TR-13; TR-17
Ortiz, Cynthia and Ruben	PC146		2026-07-02	TR-9; TR-10; TR-11; TR-12; TR-17
Patel, Purvik	PC090		2026-06-28	TR-4; TR-9; TR-11; TR-12; TR-13; TR-17
Persky, Hilary	PC125		2026-06-29	TR-9; TR-11; TR-12; TR-13; TR-14; TR-17
Reskakis, George D.	PC014		2026-06-19	TR-1; TR-11; TR-12; TR-14; TR-17
Ressler, Dena	PC054		2026-06-24	TR-1; TR-9; TR-10; TR-11; TR-12; TR-13; TR-17
Robbins, Deborah	PC024		2026-06-20	TR-4; TR-9; TR-11; TR-12; TR-13; TR-17
Rocha, Christine	PC077		2026-06-27	TR-1; TR-4; TR-10; TR-12; TR-14
Romanski, Walter	PC078		2026-06-27	TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Rose, Lisa	PC040		2026-06-22	TR-9; TR-11; TR-12; TR-13; TR-17
Rozum, JoAnn	PC145		2026-06-30	TR-1; TR-12
Sackson, Eugenia	PC126		2026-06-29	TR-1; TR-11; TR-12; TR-17
Schile, Ron	PC071		2026-06-26	TR-9; TR-10; TR-17
Schiro, JoAnna	PC127		2026-06-29	TR-9; TR-11; TR-12; TR-14; TR-17
Schmais, Beth	PC059		2026-06-25	TR-1; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-17
Scobey, David	PC128	Corporate Aircraft Association	2026-06-29	TR-4; TR-16
Sehatpour, Helia	PC149		2026-06-29	TR-2; TR-6; TR-8; TR-9; TR-10; TR-12; TR-14; TR-15; TR-17
Sette, Danielle	PC035		2026-06-21	TR-4; TR-9; TR-10; TR-12; TR-14; TR-17
Sheridan, Amanda	PC129		2026-06-29	TR-12
Sherman, Linda	PC036		2026-06-21	TR-1; TR-4; TR-9; TR-11; TR-12; TR-13; TR-17
Soltz, Ned	PC002		2026-06-17	TR-8; TR-9; TR-10; TR-12; TR-17
Stabile, Paul	PC130		2026-06-29	TR-4; TR-9; TR-10; TR-11; TR-12; TR-13; TR-17
Stickel, Mary Ellen	PC131		2026-06-29	TR-9; TR-10; TR-11; TR-12; TR-13; TR-17
Szopinski, Michal	PC132		2026-06-29	TR-4; TR-7; TR-17
Taieb, Celestine	PC025		2026-06-20	TR-1; TR-4; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-17
Tedesco, Patricia	PC133		2026-06-29	TR-1; TR-9; TR-11; TR-12; TR-17

COMMENTER	ID NUMBER	AFFILIATIONS/AGENCIES	DATE	RESPONSE(S)
Tiritilli, Henry	PC134		2026-06-29	TR-9; TR-11; TR-12; TR-17
Trosky, John A.	PC135		2026-06-29	TR-1; TR-4; TR-9; TR-10; TR-12; TR-13; TR-14; TR-17
Tsui, Winnie	PC136		2026-06-29	PC136
Tydings, Heather	PC137		2026-06-29	TR-1; TR-4; TR-10; TR-17
Van Zwaren, Anthony	PC138		2026-06-29	TR-2; TR-12; TR-14; TR-17
Voorhis, Chloe	PC072		2026-06-26	TR-9; TR-11; TR-12; TR-13; TR-14; TR-15; TR-17
Voorhis, Karen	PC091		2026-06-28	TR-8; TR-9; TR-11; TR-12; TR-17
Walden, Donald C.	PC139		2026-06-29	TR-12; TR-17
Wannamaker, Hallie	PC026		2026-06-20	TR-8; TR-9; TR-10; TR-12; TR-17
Wasley, Bill	PC140		2026-06-29	TR-1; TR-4; TR-5; TR-8; TR-9; TR-10; TR-11; TR-12; TR-13; TR-14; TR-15; TR-17
Weber, Phyllis	PC141		2026-06-29	TR-1; TR-4; TR-8; TR-9; TR-10; TR-12; TR-14; TR-17
Williams, Jeff	PC006		2026-06-18	TR-9; TR-12; TR-17
Wright, Jim	PC007		2026-06-18	TR-4; TR-9; TR-11; TR-12; TR-17
Young, Karen	PC060		2026-06-25	PC060
Zanetakos, Nicole	PC015		2026-06-19	TR-9; TR-11; TR-12; TR-17
	PC027	Hackensack Environmental Commission and Green Team	2026-06-20	TR-1; TR-4; TR-10; TR-11; TR-12; TR-14; TR-15; TR-17
Public Workshop (PW)				
Beukelaer, Kenny	PW001		2026-06-17	TR-1; TR-3; TR-4; TR-11; TR-12
Byer, Alicia L	PW002	Bergen County Audubon Society	2026-06-19	TR-9; TR-11; TR-12; TR-16
Laverty, Tammy	PW003	Meadowlands Environment Center	2026-06-17	TR-4; TR-9; TR-11; TR-12; TR-13; TR-14
Longo, Patricia	PW004	Bergen County Audubon Society, Hackensack Public Schools	2026-06-17	TR-11; TR-12; TR-17
McCarthy, Elaine C	PW005	Bergen County Audubon Society	2026-06-17	TR-4; TR-11; TR-12
McGowan, Lynda	PW006	Bergen County Audubon Society	2026-06-20	TR-6; TR-9; TR-12
Nickeson, Karen	PW007		2026-06-17	TR-9; TR-11; TR-12; TR-13
Sadowski, Marilyn	PW008		2026-06-17	TR-8; TR-9; TR-10; TR-12; TR-17
Scampas, Mary Ann	PW009		2026-06-17	TR-10; TR-11; TR-12
Sheehan, Bill	PW010	Hackensack Riverkeeper	2026-06-17	TR-17
Stickel, Mary Ellen	PW011		2026-06-17	TR-12
Tierney, Tyler	PW012		2026-06-18	TR-6; TR-11; TR-12
Torino, Don	PW013		2026-06-17	TR-1; TR-8; TR-11; TR-12; TR-14; TR-17
Auth, Robert	PW014	New Jersey General Assembly, 39th Legislative District	2026-06-18	This letter was placed in the comment box during the Public Workshop on June 17, 2026. However, the letter is addressed to Secretary Sean Duffy and dated May 12, 2026, which pre-dates the public comment period. The letter does not reference the Proposed Action and therefore was not considered in the development of the Final EA.

NOTE:
1 The same comment letter from the Mayor and Council of the Borough of Little Ferry was received via both email and hard-copy mail.
SOURCE: Ricondo & Associates, Inc., September 2026.

4. COMMENT RESPONSES

Comment responses have been organized based on their correlation to specific topics within the EA. Comment responses have been categorized into the following two sections:

- Topical Responses
- Individual Responses

Comment responses have been categorized into the individual topic numbers identified in **Table 3**.

TABLE 3 DRAFT ENVIRONMENTAL ASSESSMENT COMMENT RESPONSE TOPICS

RESPONSE NUMBER	SUB-TOPIC
Topical Responses	
TR-1	Airport Benefits
TR-2	Airport Use and Flight Restrictions
TR-3	Accommodation of Aircraft Activity
TR-4	Purpose and Need
TR-5	Reduction of Ferry Flights
TR-6	Alternatives to Avoid Impacts
TR-7	No Action Alternative
TR-8	Aviation Emissions and Air Quality
TR-9	Biological Resources
TR-10	Noise and Noise-Compatible Land Use
TR-11	Water Resources – Floodplains
TR-12	Water Resources – Wetlands
TR-13	Water Resources – Surface Waters
TR-14	Environmental Justice/Climate Change
TR-15	Cumulative Effects
TR-16	General Project Support
TR-17	General Opposition or Concern
Individual Responses	
AF001	US Fish and Wildlife Service
AF002	US Environmental Protection Agency
AF003	US Army Corps of Engineers
AS001	New Jersey Department of Environmental Protection
EO001	Township of South Hackensack
EO002	Mayor and Council of Borough of Little Ferry

RESPONSE NUMBER	SUB-TOPIC
LO002	Regional Plan Association
LO004	Hackensack Riverkeeper
LO006	Teaneck Creek Conservancy
PC001	Dhulipala, Nancy
PC005	Laverty, Tammy
PC027	Hackensack Environmental Commission and Green Team
PC037	Hackensack Environmental Justice Alliance
PC060	Young, Karen
PC086	Kieras, Conrad
PC136	Tsui, Winnie
PC150	Longo, Patricia

SOURCE: Ricondo & Associates, Inc., September 2026.

TOPICAL RESPONSES

TR-1 AIRPORT BENEFITS

Summary:

A number of commenters stated that the Proposed Action primarily benefits Signature and other users of the Airport and provides little or no transportation benefit to surrounding communities or the public.

Response:

TEB, located approximately 8 miles northwest of Midtown Manhattan, provides the most convenient corporate access to New York City's core business districts by virtue of its ground transportation connectivity and its close proximity. These factors are highly valued by aircraft operators and passengers, which is reflected in TEB's ranking as first in jet aircraft operations among US airports without scheduled airline service. According to the New Jersey Department of Transportation's Statewide Airport Economic Impact Study completed in 2016, TEB supported approximately 4,900 jobs, $352 million in annual payroll, and more than $1.1 billion in annual economic output, underscoring its importance to New Jersey's aviation system and local economy.[10] These economic contributions directly benefit surrounding communities through local employment opportunities, spending by airport users and employees at area businesses, and demand for ground transportation services. The Proposed Action would further sustain these benefits by generating construction-related employment and improving operational efficiency at the Airport.

As noted in Section 1.2 of the EA, TEB is classified by FAA as a national public use, reliever airport (non-primary). Reliever airports are designated to relieve air traffic and congestion at commercial service airports as well as to provide more GA access. TEB operates as a GA airport used by private aviation, corporate businesses, and air taxi services, and does not have scheduled airline service: its primary function is to provide facilities for non-scheduled,

[10] New Jersey Department of Transportation (NJDOT), Bureau of Aeronautics. 2016, *New Jersey Statewide Airport Economic Impact Study: Evaluation of Economic and Fiscal Impacts of 37 Public-Use New Jersey Airports*. Prepared by AECOM Technical Services, Inc., September 2016.

GA aircraft desiring access to the New York and New Jersey metropolitan area as an alternative to operating at the Port Authority's busy commercial airports, which include Newark Liberty International Airport (EWR) in New Jersey, as well as John F. Kennedy International Airport (JFK) and LaGuardia Airport (LGA) in New York. Thus, one of the public benefits of TEB is providing facilities for smaller aircraft rather than adding to aircraft activity at JFK, LGA, or EWR, three of the most congested airports in the country. See also Topical Response TR-2.

TR-2 AIRPORT USE AND FLIGHT RESTRICTIONS

Summary:

A number of commenters stated that general aviation (GA) activity should instead be accommodated at commercial service airports or that the use of TEB should be restricted or limited.

Response:

TEB is classified by the FAA as a national, nonprimary reliever airport. Reliever airports are specifically designated to reduce congestion at commercial service airports by providing GA access to the surrounding metropolitan area. TEB serves as an alternative to the Port Authority's commercial service airports, including Newark Liberty International Airport (EWR) in New Jersey and John F. Kennedy International Airport (JFK) and LaGuardia Airport (LGA) in New York. Accommodating TEB's general aviation activity at these commercial service airports would be contrary to TEB's designated reliever function and would increase congestion at airports serving scheduled airline operations. To support GA activity at TEB, the Port Authority leases facilities to three fixed base operators (FBOs): Atlantic Aviation, Jet Aviation, and Signature. Signature owns and operates three FBO facilities at the Airport: Signature East, Signature South, and Signature West.

Under 49 U.S.C. § 47107(a) and FAA Airport Sponsor Grant Assurances Nos. 19, 22, and 23 (April 2025), the Port Authority, as the Airport sponsor, is responsible for operating and maintaining TEB in accordance with the approved Airport Layout Plan (ALP) and Airport Certification Manual (ACM). These obligations require the Airport to be operated safely and efficiently and to remain available to aeronautical users on reasonable and nondiscriminatory terms. Accordingly, the Port Authority may not arbitrarily restrict aeronautical use of TEB or require aircraft operators to use other airports.

The Port Authority also may not restrict the use of Signature leased facilities when adequate apron and hangar capacity is available. However, Signature may manage access to its leaseholds as necessary to maintain safe and efficient operations. As discussed in Section 2.2 of the EA, Signature has implemented operational measures, including aircraft reservations and temporary ramp closures when apron capacity is reached, to manage congestion and maintain ramp safety under existing conditions.

FAA has plenary authority over the safe and efficient operation of the National Airspace System, including exclusive authority over aircraft operations, management of the airspace and runway access (49 U.S.C. 40103(b)). The FAA does not manage access to airport terminal/gate facilities though it places certain conditions on how the airport sponsor manages its facilities.

TR-3 ACCOMMODATION OF AIRCRAFT ACTIVITY

Summary:

Commenters expressed concern that the Proposed Action constitutes an airport expansion that would increase operational capacity and induce additional aviation activity at TEB. Commenters characterized the Proposed Action as an "expansion."

Response:

As described in Section 2.3 of the EA, the Proposed Action includes development at Signature East and Signature South sites through the construction of aircraft apron, hangars, and associated support facilities on existing Airport property. The Proposed Action would not expand Airport property or increase the Airport's operational capacity, which is dictated by the runway and taxiway system. Rather, it provides additional aircraft parking adjacent to existing facilities to improve operational efficiency and safety.

The Proposed Action would not add runways or taxiways or otherwise increase the Airport's capacity to accommodate additional aircraft operations. As described in the EA, implementation of the Proposed Action would not increase total aircraft operations compared to the No Action Alternative. Future aircraft activity at TEB is driven by regional aviation demand not by the construction of hangar, apron, and parking space.

TEB provides the most efficient GA access to Midtown Manhattan in New York City, and operators continue to choose TEB over other airports in the region because of its proximity and convenience. Demand for the Airport is consistently high, which is reflected in TEB's ranking as first in jet aircraft operations among US airports without scheduled airline service. With the exception of 2020 and 2021, when aircraft operations declined due to the COVID-19 pandemic, TEB has accommodated between approximately 155,000 and 175,000 aircraft operations annually since 2013 (see Exhibit 1-2 of the EA). During this time period, the Airport reached its highest annual activity level in 2017, with approximately 175,000 aircraft operations, although TEB routinely handled more than 200,000 annual aircraft operations between 1997 and 2007, with a peak of 264,400 operations in 2000. Although operations declined to approximately 85,000 in 2020 during the COVID-19 pandemic, annual activity exceeded pre-pandemic (2019) levels in both 2023 and 2024, while remaining below the 2017 peak. Exhibit 1-2 of the EA also illustrates the number of operations handled by Signature's facilities, which increased from 31,760 operations in 2013 to 127,242 operations in 2024, reflecting continued demand for aircraft parking, hangar space, and related services at TEB.

Signature prepared an FAA-approved aviation activity forecast documenting projected aircraft operations at TEB and activity specific to Signature's facilities over a 20-year planning period (see Section 1.2.2 and Appendix A of the EA). Under the forecast, Signature operations are projected to increase from 127,242 in 2024 to 197,633 in 2044, representing a compound annual growth rate (CAGR) of 2.2 percent, compared to a forecast CAGR of 2.1 percent for total TEB operations. As a result, Signature's share of total airport operations is projected to increase from 73.8 percent in 2024 to 75.8 percent in 2044. This projected growth reflects continued demand for Signature's facilities at TEB rather than growth induced by the Proposed Action.

The aviation activity forecast also evaluated trends in the aircraft fleet accommodated at Signature's facilities. Historically, large and medium jets have represented the majority of Signature operations at TEB and are forecast to experience the highest growth, with CAGRs of 2.3 percent and 2.2 percent, respectively. Small jets and other aircraft are each forecast to grow at a CAGR of 2.1 percent. The forecast indicates that both aircraft operations and the proportion of larger aircraft using Signature's facilities are projected to increase. As a result, demand for aircraft parking and hangar space is expected to continue to grow. Without the additional aircraft parking and hangar capacity provided by the Proposed Action, the growing fleet is expected to exacerbate existing deficiencies in apron and hangar space (see Section 2.2.1), increase ferry flights (see Section 2.2.3), and contribute to continued operational inefficiencies (see Section 2.2.4) at Signature facilities.

As stated in Section 4.3.3.1 of the EA, implementation of the Proposed Action, or other viable action alternatives, would not cause an increase in the number of aircraft operations. New facilities at the Signature East and Signature South sites would provide additional aircraft parking, thereby alleviating the need for ferry flights. Under the Proposed Action scenario, ferry flight operations are assumed to be effectively eliminated following completion of the proposed improvements (anticipated by 2028). Accordingly, total Signature and overall Airport operations under the Proposed Action scenario reflect the removal of forecast ferry flight operations relative to the No Action scenario.

This would result in approximately 2.6 percent fewer total Airport operations and 3.4 percent fewer Signature operations compared to the No Action Alternative, as identified in Section 4.3.3.4 of the EA. Consequently, the Proposed Action, or its action alternatives, would reduce aircraft operations relative to the No Action Alternative. The proposed improvements are intended to accommodate existing and forecast demand within Signature's leaseholds. The Proposed Action would not induce additional flights or expand the Airport's operational capacity or property boundary.

TR-4 PURPOSE AND NEED

Summary:

Commenters questioned the need for the Proposed Action, stating that additional aircraft parking is unnecessary. Several commenters also expressed concern that the Airport is already congested and asserted that the Proposed Action would increase congestion rather than address existing operational deficiencies.

Response:

As the federal agency responsible for ensuring the safe and efficient use of the National Airspace System, the FAA reviews proposed airport development projects to determine whether they are consistent with applicable aviation planning, design, safety, and environmental requirements. Consistent with these responsibilities and the requirements of NEPA and FAA Orders 1050.1G and 5050.4B, the Purpose and Need for the Proposed Action was developed to address identified operational deficiencies while satisfying the FAA's statutory obligations and environmental review requirements.

A description of the Purpose and Need for the Proposed Action is provided in Section 2 of the EA. The Proposed Action includes projects at both Signature East and Signature South, which are treated as a single project in the EA. The purpose of the Proposed Action is to better accommodate both existing and forecast demand at TEB Signature East and Signature South leaseholds while enhancing the safety and efficiency of aircraft operations related to aircraft parking (see Section 2.1 of the EA). 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 (see Section 2.2.1 of EA).
- The modern 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 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, which has resulted in unnecessary ferry flights. A ferry flight occurs when a pilot lands at TEB but cannot find 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 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 (see Section 2.2.4 of EA).

See also Topical Response TR-3.

TR-5 REDUCTION OF FERRY FLIGHTS

Summary:

Commenters questioned whether the additional aircraft parking provided as part of the Proposed Action would reduce unnecessary ferry flights.

Response:

As identified in Section 2.2.3 of the EA, the lack of adequate aircraft parking on aprons and within hangars at TEB has resulted in an increase in aircraft operations, commonly referred to as ferry flights, both at TEB and within the complex New York metropolitan airspace. A ferry flight occurs when a pilot lands at TEB but cannot find an available parking position for the aircraft. In these cases, the pilot must deplane passengers, fly the aircraft to another airport where parking is available, and later return to TEB to pick up passengers. These repositioning flights generate two additional aircraft operations at TEB—one departure and one arrival—for each occurrence.

Ferry flight operations exacerbate congestion and operational inefficiencies associated with limited aircraft parking at the existing Signature East and Signature South leaseholds (see Sections 2.2.3 and 2.2.4 of the EA). These repositioning flights also result in additional operating costs and logistical challenges for aircraft operators and contribute to aircraft noise, air emissions, and airspace congestion within the New York and New Jersey metropolitan area. As discussed in Section 1.2.2.2, the forecast increase in aircraft operations at Signature's facilities, including ferry flights, will further strain the limited apron and hangar space available under existing conditions. Without additional aircraft parking and hangar capacity, ferry flights will continue to contribute to congestion and operational inefficiencies, and these conditions are expected to worsen as demand for Signature's facilities increases. Accordingly, the Proposed Action is needed to provide additional apron and hangar space that will reduce unnecessary ferry flights, improve aircraft parking efficiency, and enhance overall airport operations.

As stated in Section 4.3.3.1 of the EA, implementation of the Proposed Action, or other viable action alternatives, would not cause an increase in the number of aircraft operations. New facilities at the Signature East and Signature South sites would provide additional aircraft parking, thereby alleviating the need for ferry flights. Under the Proposed Action scenario, ferry flight operations are assumed to be effectively eliminated following completion of the proposed improvements (anticipated by 2028). Accordingly, total Signature and overall Airport operations under the Proposed Action scenario reflect the removal of forecast ferry flight operations relative to the No Action scenario. This would result in approximately 2.6 percent fewer total Airport operations and 3.4 percent fewer Signature operations compared to the No Action Alternative, as identified in Section 4.3.3.4 of the EA. Consequently, the Proposed Action, or its action alternatives, would reduce aircraft operations relative to the No Action Alternative.

TR-6 ALTERNATIVES TO AVOID IMPACTS

Summary:

Commenters stated that reasonable alternatives to the Proposed Action exist and questioned whether the alternatives analysis adequately evaluated options that would avoid or minimize environmental impacts. Several commenters suggested alternative development and non-development options, including the use of other airports or closure of the Airport, and asserted that these alternatives would avoid or reduce impacts to wetlands.

Response:

In accordance with FAA Orders 1050.1G and 5050.4B, Section 3 of the EA outlines the alternatives to the Proposed Action and describes the screening process used to evaluate which alternatives would best meet the Purpose and Need of the Proposed Action. The alternatives identified for evaluation include, but are not limited to, the use of other modes of transportation, the use of other airports, use of other FBO facilities, different facility layouts, and the no action alternative. The on-Airport alternatives analysis included the Use, Reconfiguration, or Expansion of

Signature West (Alternative 4; Section 3.3.4), Signature East (Alternative 5; Section 3.3.5), Signature South (Alternative 6; Section 3.3.6), and Development of Other Sites at TEB (Alternative 7; Section 3.3.7). Alternatives 5 and 6 were carried forward for detailed analysis because they satisfy the Purpose and Need for the Proposed Action and were determined to be practicable to construct and operate (see Sections 3.4.2 and 3.4.3). Alternative 7 was not carried forward because it was determined to be impracticable to construct and operate for the reasons described in Section 3.4.4. Additional information regarding the evaluation of these on-Airport alternatives is provided in Appendix D.

Signature and the Port Authority sought to avoid and minimize impacts to wetlands to the maximum extent practicable by evaluating multiple non-development alternatives to the Proposed Action. These alternatives included the No Action Alternative (Section 3.3.1), Use of Other Airports (Alternative 2; Section 3.3.2), and Use of Other Modes of Transportation (Alternative 3; Section 3.3.3). Although these alternatives would avoid direct impacts to wetlands, they would not satisfy the Purpose and Need for the Proposed Action for the reasons described in Sections 3.3.2 and 3.3.3 of the EA and, therefore, were not carried forward for detailed analysis. Closure of the Airport, as suggested by some commenters, was not evaluated as a reasonable alternative because the Port Authority is obligated under federal grant assurances to operate and maintain TEB and may not unilaterally close the Airport (see Topical Response TR-2). Additional information regarding the evaluation of these practicable alternatives, including the basis for determining they would not meet the Purpose and Need for the Proposed Action, is provided in Sections D-3.2 and D-3.3 of Appendix D.

For the alternatives carried forward for detailed analysis (Alternatives 5 and 6), Signature evaluated alternative site configurations for the Signature East and Signature South facilities to avoid and minimize impacts to wetlands, particularly higher quality palustrine forested and scrub-shrub wetlands. Alternative configurations for both Signature East (Alternative 5) and Signature South (Alternative 6) were evaluated to avoid and minimize wetland impacts to the maximum extent practicable (see Section 3.3.5 and 3.3.6, and Appendix K). The proposed layouts and sizes of the apron, hangar, terminal, and parking facilities analyzed for each configuration were developed in accordance with FAA Advisory Circular (AC) 150/5300-13B, *Airport Design*, and Airport Cooperative Research Program (ACRP) Report 113, *Guidebook for General Aviation Terminal and Landside Design*. The layouts as revised in the Final EA were based on the forecast number and types of aircraft expected to use the Signature facilities, and the proposed apron and hangar areas reflect the minimum area necessary to safely maneuver, park, and operate aircraft while satisfying the Purpose and Need for the Proposed Action.

Since publication of the Draft EA, 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. Reducing the vehicular parking footprint from 91 automobile parking spaces to 73 automobile parking spaces for the proposed development at Signature South minimized total wetland impacts from 11.0 acres to 10.9 acres. This reduction in parking area was made in response to agency comments concerning the need for all of the FBO facilities and whether some portions could be moved out of wetland areas. After reviewing the plans and facility requirements for both Signature East and Signature South, Signature determined that a portion of the planned automobile parking at Signature South could be moved off-site (the planned automobile parking at Signature East does not impact wetlands). Moving some of the automobile parking for Signature South creates operational challenges and will require shuttling employees, flight crews, and passengers during peak periods to off-site parking areas. However, Signature has determined it is feasible and will reduce the overall wetland impacts of the proposed project. The aircraft hangar, FBO terminal, and aircraft apron footprints were reduced due to site topography, which would have necessitated placement of a retaining wall within a taxiway object free area. These facilities were revised to maintain compliance with the applicable FAA airport design standards in FAA AC 150/5300-13B.

Tables 3-2 and 3-3 of the EA summarize the alternative site configurations that were evaluated, including the Proposed Action, as modified since the Draft EA. Configuration 1 for both Alternatives 5 and 6 was not carried forward because it would not satisfy the Purpose and Need for the Proposed Action. Among the remaining practicable configurations, Configuration 5 at Signature East (the Proposed Action) represents the smallest practicable development footprint evaluated under Alternative 5, while Configuration 6 at Signature South (the Proposed Action) represents the smallest practicable footprint evaluated under Alternative 6. Although complete avoidance of wetlands was not practicable because of physical site constraints, operational requirements, and the Purpose and Need for the Proposed Action, the selected configurations minimize overall wetland impacts, including impacts to higher quality palustrine forested and scrub-shrub wetlands, to the maximum extent practicable. The Section 404(b)(1) alternatives analysis (see Appendix K) documents the evaluation of practicable alternatives and the measures incorporated into the Proposed Action to avoid and minimize wetland impacts. For additional discussion of wetland impacts and proposed compensatory mitigation, see Topical Response TR-12.

TR-7 NO ACTION ALTERNATIVE

Summary:

Commenters expressed support for the No Action Alternative and no more development at the Airport. Commenters also questioned the need for the Proposed Action.

Response:

FAA Order 1050.1G requires a thorough and objective assessment of the Proposed Action, the No Action Alternative, and reasonable alternatives to the degree commensurate with the nature of the Proposed Action and agency experience with the environmental issues involved. A two-step screening process was established to evaluate the list of potential alternatives to determine which of them were 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 (Step 1) and must be practical or feasible from the technical and economic standpoint and using common sense (Step 2). The EA evaluated six main categories of alternatives, in addition to the No Action Alternative. The alternatives analysis presented in Section 3 and Appendix D of the EA are consistent with the requirements of NEPA and FAA Order 1050.1G. See Response TR-4 regarding Purpose and Need of the Proposed Action.

Under Section 102(C) of NEPA, the No Action Alternative serves as the basis for comparison of the impacts of the other alternatives carried forward for detailed analysis in a NEPA document, therefore the No Action Alternative was retained for detailed analysis in the EA. As identified in Section 3.3.1 of the EA, the No Action Alternative would not redevelop the existing Signature FBO facilities at TEB and therefore would not provide additional or adequate FBO facilities for Signature to accommodate existing and forecast demand at their FBO facilities. The No Action Alternative would not provide additional Signature FBO apron or hangar space, terminal facilities, or automobile parking, and existing overall facility and aircraft parking deficits would be exacerbated under future conditions considering the forecast increase in operations and the fleet mix evolution toward larger jet aircraft at Signature facilities. Without the proposed improvements to aircraft apron space, hangars, and supporting facilities, Signature would continue to experience operational inefficiencies and safety risks at their existing facilities, as well as overall Signature-related ferry flights at TEB. Therefore, the No Action Alternative would not meet the purpose and need of the project.

TR-8 AVIATION EMISSIONS AND AIR QUALITY

Summary:

Commenters expressed concern that emissions associated with aircraft operations and aviation fuel combustion could adversely affect local air quality and public health. Several commenters emphasized the importance of clean air and questioned the potential health effects of air pollutant emissions associated with the Proposed Action.

Response:

Signature assessed the impacts of the Proposed Action and its action alternatives on aviation emissions and air quality in accordance with FAA Order 1050.1G, Section 176(c)(1) of Title I of the *Clean Air Act (CAA) Amendments of 1990*,[11] and 40 Code of Federal Regulations (CFR) Part 93, *Determining Conformity of Federal Actions to State or Federal Implementation Plans*.[12] The assessment evaluated the potential for impacts to air quality from construction and operational emissions from the Proposed Action and reasonable alternatives relative to the No Action Alternative.

Under the CAA, the US Environmental Protection Agency (USEPA) has developed National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), sulfur dioxide (SO_2), lead (Pb), particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). To protect public health and enhance the quality of air resources, the CAA established primary standards that define the maximum concentration of a criteria air pollutant that protects public health, including sensitive populations such as the elderly, children, and asthmatics, and secondary standards that define the maximum concentrations of a criteria air pollutant that protects the public welfare, such as protection against decreased visibility and damage to crops, vegetation, and buildings. 40 CFR Part 93 (General Conformity Rule) is designed to ensure that air pollutant emissions associated with a federal action do not prevent achievement of state and national air quality goals. As such, in areas that do not meet the NAAQS standards, the General Conformity Rule applies. TEB is located within Bergen County, which is designated by the USEPA as a serious nonattainment area for the 2015 8-hour O_3 standard, and severe nonattainment area for the 2008 8-hour O_3 standard. Bergen County is in attainment for all other criteria pollutants.

Per FAA Order 1050.1G, a significant impact on air quality would occur if pollutant concentrations were to exceed one or more of the NAAQS. As described in Section 4.3.3.1. of the EA, a quantitative evaluation of construction emissions was conducted to determine potential impacts. Specifically, construction emissions were estimated by using the largest potential footprint for both Signature East and Signature South sites (i.e., Alternative 5 Configuration 2 and Alternative 6 Configuration 2) and assumed all construction would be completed within one calendar year. See Sections 3.3.5 and 3.3.6 of the EA for detailed facilities area alternative configurations for Signature East and Signature South. Combined construction emissions for development of both Signature East and Signature South are below the General Conformity *de minimis* thresholds for the largest configuration alternatives. While many commenters expressed concern over air quality and the potential health impacts as a result of the Proposed Action and its action alternatives, construction of the Proposed Action, which has a smaller development footprint than the layouts used for the quantitative emissions analysis, would not exceed the *de minimis* thresholds, and therefore does not require a general conformity determination and would not result in exceedances of the

[11] Clean Air Act Amendments of 1990, 42 U.S.C § 7501 et seq. (1990).

[12] Determining Conformity of Federal Actions to State or Federal Implementation Plans, 40 C.F.R. § 93 (1993).

NAAQS established to protect public health.[13] Technical assumptions, methodologies, and models used to conduct the air quality impact analysis are included in Appendix F.

Signature and the Port Authority coordinated with the New Jersey Department of Environmental Protection (NJDEP) throughout the preparation of the EA. NJDEP identified the requirements necessary to protect air quality resources, and those requirements have been incorporated into the EA. As documented in Section 4.3.3.3 of the EA, Signature and the Port Authority will adhere to the applicable regulations enforced by NJDEP to protect public health and air quality resources under New Jersey Administrative Code (N.J.A.C.), including obtaining stationary construction equipment permits (N.J.A.C. 7:27-8.2(c) 1-22 and N.J.A.C. 7:27-8.2(d)15); adhering to the three-minute idling limit (N.J.A.C. 7:27-14 and 15); controlling fugitive dust and preventing off-site odors (N.J.A.C. 7:27-5.2); and adhering to applicable state inspection requirements (N.J.A.C. 13:20-46 and 26).

Signature and the Port Authority also qualitatively assessed operational emissions resulting from the Proposed Action as compared to the No Action Alternative. As discussed in Topical Response TR-3, the Proposed Action would not induce additional flights. As identified in Section 2.2.3 of the EA, the lack of adequate aircraft parking on aprons and within hangars at TEB has resulted in an increase in aircraft operations, commonly referred to as ferry flights, both at TEB and within the complex New York metropolitan airspace (for more information on ferry flight operations, see Section 2.2.3 of the EA and Topical Response TR-5). Without additional aircraft parking and hangar capacity, ferry flights are projected to increase (see Section 2.2.3 of the EA and Section A-2.7 of Appendix A), which generate additional aircraft operations and associated emissions at TEB. By providing additional apron parking and hangar space, the Proposed Action would effectively eliminate the need for ferry flights and result in fewer aircraft operations than would occur under the No Action Alternative. Therefore, the Proposed Action would result in approximately 2.6 percent fewer total airport operations and 3.4 percent fewer Signature Aviation operations compared to the No Action Alternative, resulting in no significant impact to air quality.

As the Proposed Action would not result in exceedances of the NAAQS, which are established to protect public health including sensitive populations, air pollutant emissions associated with the Proposed Action would not adversely affect public health.

TR-9 BIOLOGICAL RESOURCES

Summary:

Commenters expressed concern that the Proposed Action would adversely affect wildlife and ecological resources, including threatened and endangered species, migratory birds, bald eagles, and other protected species. Several commenters asserted that the Proposed Action would result in the permanent loss of habitat, adversely affect biodiversity and ecological health, and cause irreversible ecological impacts.

Response:

Signature assessed the potential for impacts to biological resources in accordance with FAA Order 1050.1G, including coordination with both the US Fish and Wildlife Service (USFWS) and NJDEP. Agency consultation for the Proposed Action is included in Appendix H of the EA. The USFWS indicated that there is no critical habitat for protected species within the project area, nor is there suitable habitat to support state-listed species under the jurisdiction of NJDEP.

[13] The largest Signature East configuration, Alternative 5 Configuration 2, is approximately 12 percent larger than the Proposed Action alternative for Signature East, Alternative 5 Configuration 5. The largest Signature South configuration, Alternative 6 Configuration 2, is approximately 61 percent larger than the Proposed Action alternative for Signature South, Alternative 6 Configuration 6.

As discussed in Section 4.4.2.2, two federally listed or proposed species, the tricolored bat (*Perimyotis subflavus*) and the monarch butterfly (*Danaus plexippus*), have the potential to occur within the vicinity of the Proposed Action. While suitable tricolored bat habitat is present, the USFWS indicated in their June 27, 2024, coordination letter that these areas do not appear to be preferred tricolored bat habitat (see Appendix H). In the same letter, the USFWS has indicated that the Proposed Action is not likely to jeopardize the continued existence of the tricolored bat and Endangered Species Act (ESA) Section 7(a)(4) coordination is not required. However, to ensure the Proposed Action is not likely to adversely affect the tricolored bat, the conservation measures for the tricolored bat that were recommended by the USFWS and identified in Section 4.4.3.3 of the EA would be implemented. Furthermore, while the 2023 habitat assessment did not identify suitable habitat for the monarch butterfly, and even though candidate species such as the monarch butterfly receive no substantive or procedural protection under the ESA prior to listing, Signature and the Port Authority are committed to implementing the recommended conservation measures made by the USFWS for avoiding impacts to the monarch butterfly. Those conservation measures are identified within Section 4.4.3.3 of the EA.

As documented in Section 4.4.3.3 of the EA, there are no Bald Eagles (*Haliaeetus leucocephalus*), or their nests present within the project area or within Airport property. The NJDEP Division of Fish and Wildlife's 2025 New Jersey Bald Eagle Project report identifies active and territorial bald eagle nests in Bergen County, the closest of which is in Bogota, New Jersey, more than one mile from the Airport. According to the NJDEP's *Protocols for the Establishment of Exceptional Resource Value Wetlands Pursuant to the Freshwater Wetlands Protection Act (N.J.S.A. 13:9b-1 et seq.) Based on the Documentation of State or Federal Endangered or Threatened Species (2023)*, bald eagles prey primarily on fish and favor foraging habitat such as rivers, lakes, and estuaries, with large water bodies (at least 20 acres) preferred over smaller streams and ponds. Suitable feeding habitat also includes forested wetlands with large trees (diameter at breast height greater than 8 inches) contiguous with, or within 300 meters of, a suitable water body, and suitable nesting habitat consists of large nest trees in discontinuous stands near open-water feeding grounds. The Airport, including the Signature East and Signature South sites, does not provide suitable foraging or nesting habitat for bald eagles. With the Hackensack River to the east, bald eagles are far more likely to use the river and its marshes than an active airport. Should any bald eagles or their nests be identified within the project area before or during construction, Signature will comply with applicable federal and local protections administered by the USFWS. Therefore, the Proposed Action would not adversely affect bald eagles.

The Proposed Action is unlikely to adversely affect avian species, including migratory birds protected under the Migratory Bird Treaty Act (MBTA), due to the developed nature of the Airport environs, which primarily consists of maintained vegetation, disturbed habitat, and pavement. The Airport is actively managed in accordance with the FAA-approved Wildlife Hazard Management Plan (WHMP), developed under FAA AC 150/5200-33C, *Hazardous Wildlife Attractants On or Near Airports*, which includes provisions to minimize wildlife attractants and to deter and discourage birds from Airport property, where the Proposed Action is located. With implementation of the WHMP, the presence of migratory birds and other wildlife within the project area is limited. The wetlands within the project area also lie within the highly developed landscape of the Airport, abutting pavement in service of flight activity (tarmac and taxiways), which regularly generate noise that generally reduces the use of wetlands by migratory birds and other wildlife. Further, on-site hardwood communities at both sites are stunted in growth by a combination of prior land use (e.g., grading, stockpiling, etc.), vegetation management (e.g., cutting), hydrology, soils (e.g., nutrient depauperate), and local environmental conditions (i.e., both sites are adjacent to jet airplane parking and taxiing areas that experience significant impacts from jet engine exhaust and noise). However, to ensure no adverse effects on protected avian species, Signature and the Port Authority will implement the conservation measures recommended by the USFWS and detailed in Section 4.4.3.3 of the EA.

Overall, the Proposed Action would not result in significant impacts on biological resources. Although some vegetated and wetland areas would be permanently filled as a result of the Proposed Action (see Section 4.8.3), these areas have been previously disturbed, are situated within an active airport environment, and do not contain

preferred habitat for the tricolored bat or suitable habitat for the monarch butterfly. Impacts to wetland habitat, including proposed compensatory mitigation to offset unavoidable wetland losses, are addressed in Topical Response TR-12. This determination is further supported by the Port Authority's and Signature's commitment to implementing the conservation measures recommended by the USFWS, which would ensure that the Proposed Action does not result in irreversible ecological impacts.

TR-10 NOISE AND NOISE-COMPATIBLE LAND USE

Summary:

Commenters expressed concern that the Proposed Action would increase aircraft noise and adversely affect the quality of life in surrounding communities. Several commenters asserted that the Proposed Action would intensify existing noise impacts and contribute to additional noise pollution.

Response:

Signature assessed the impact of the Proposed Action and its action alternatives on noise and noise-compatible land use. As described in Section 4.7.3.1 of the EA, a detailed aircraft noise analysis was not necessary for the Proposed Action as it would not alter runway configurations, increase the number of aircraft operations, change the types of aircraft using the Airport, or modify aircraft arrival and departure tracks or flight profiles when compared to the No Action Alternative. The additional aircraft parking being proposed at the Signature East and Signature South sites would not increase aircraft operations but would reduce the need for ferry flights (see Topical Response TR-5). The Proposed Action is projected to result in approximately 2.6 percent fewer total Airport operations and 3.4 percent fewer Signature operations compared to the No Action Alternative. Given that the Proposed Action would not result in changes to aircraft operations or other factors that could increase aircraft noise exposure when compared to the No Action Alternative, it would not have the potential to cause significant noise impacts as defined in FAA Order 1050.1G and in Section 4.7.3.2 of the EA. There are no noise-sensitive land uses located within the General Study Area for the Proposed Action, and existing land uses within the General Study Area are compatible with current aircraft noise exposure levels.

Construction activities associated with the Proposed Action would generate temporary noise; however, construction noise would be localized, temporary in duration, and managed through compliance with applicable local noise requirements and best management practices.

As the owner and operator of TEB, the Port Authority implements a comprehensive aircraft noise management program[14] intended to address aircraft noise in surrounding communities. The program establishes mandatory departure noise limits for each runway and includes an enforcement system for aircraft that exceed the applicable noise thresholds. The program also includes a voluntary restraint on non-essential aircraft operations between the hours of 11:00 p.m. and 6:00 a.m. The Port Authority actively coordinates with affected communities through the Teterboro Aircraft Noise Abatement Advisory Committee (TANAAC), which comprises local elected officials and members of the aviation community. TANAAC works with airport management and the FAA to balance community quality-of-life concerns with the continued safe and efficient operation of the Airport.

The Port Authority also prepared Noise Exposure Maps (NEMs) and a Noise Compatibility Program (NCP) for the Airport in accordance with 14 CFR Part 150 to evaluate aircraft noise exposure and address noncompatible land uses. The Port Authority now implements the NCP. As part of the NCP, the Port Authority intends to implement 16

[14] Port Authority of New York and New Jersey, *TEB Noise Office*, https://aircraftnoise.panynj.gov/teb-airport-noise-office/ (accessed June 29, 2026).

noise abatement measures[15] and may consider implementation of 4 land use measures[16] and all 13 programmatic measures.[17, 18]

TR-11 WATER RESOURCES – FLOODPLAINS

Summary:

Commenters expressed concern that the Proposed Action would increase impervious surfaces, exacerbate flooding, and increase flood risk to surrounding communities. Several commenters also questioned the construction of additional pavement within the 100-year floodplain and expressed concern regarding potential risks to nearby homes, businesses, and public safety.

Response:

Signature assessed floodplain impacts in accordance with FAA Order 1050.1G; EO 11988, *Floodplain Management*; and US DOT Order 5650.2, *Floodplain Management and Protection*. The assessment evaluated potential encroachments into Federal Emergency Management Agency (FEMA)-designated floodplains associated with construction and operation of the Proposed Action relative to the No Action Alternative. Because the Airport is located within the 100-year floodplain of the Hackensack River, construction of the Proposed Action would constitute a floodplain encroachment and require a Flood Hazard Area Verification and Flood Hazard Area Individual Permit from NJDEP. As such, NJDEP issued the Flood Hazard Area Verification and Flood Hazard Area Individual Permit on July 16, 2026 (see Appendix R). Consistent with EO 11988 and DOT Order 5650.2, alternatives to the Proposed Action were evaluated to determine whether a practicable alternative exists that would avoid construction within the floodplain. As documented in Appendix D, no practicable alternative was identified because all on-Airport development sites capable of satisfying the Purpose and Need are located within the floodplain.

As discussed in Section 4.8.3.3 of the EA, both the Signature East and Signature South sites were designed to comply with the New Jersey stormwater quality, quantity, and groundwater recharge standards (N.J.A.C. 7:8). However, due to FAA Advisory Circular 150/5200-33C, *Hazardous Wildlife Attractants on or near Airports* and existing site constraints, as documented in Appendix L of the EA, the project is unable to fully meet the green infrastructure standards of N.J.A.C. 7:8 and will require a Green Infrastructure Hardship Exception. The hardship exception only applies to the green infrastructure requirements; the project will be fully compliant with stormwater quality, quantity, and groundwater recharge standards (N.J.A.C. 7:8). Under existing conditions, both the Signature East and Signature South sites are completely inundated by tidal flood waters during the 100-year storm event. Given compliance with N.J.A.C. 7:8 stormwater water quantity requirements (peak reduction), the project is not anticipated to exacerbate flooding in the region or negatively impact the Rebuild By Design project improvements planned in this area. This conclusion is further supported by NJDEP's independent review of the proposed stormwater management design

[15] Noise abatement measures are those that control noise at the source. These measures include airport layout modifications, noise barriers, flight path changes, preferential runway use, and arrival and departure procedures.

[16] Land use measures are intended to reduce the effects of aircraft noise on existing noncompatible land uses located within areas of elevated noise exposure. Such measures may include residential sound insulation, property acquisition, or other strategies designed to improve land use compatibility in areas affected by aircraft noise.

[17] Program management measures are intended to support the implementation, administration, and ongoing evaluation of recommended noise abatement and land use measures. These measures help ensure the effectiveness of the Noise Compatibility Program and facilitate coordination among the Port Authority, the FAA, airport users, and surrounding communities.

[18] 88 Federal Register 2751, *Approval of Teterboro Airport (TEB) Noise Compatibility Program*, January 17, 2023, https://www.federalregister.gov/documents/2023/01/17/2023-00651/approval-of-teterboro-airport-teb-noise-compatibility-program (accessed June 29, 2026).

through the Flood Hazard Area Individual Permit process, which evaluates compliance with the applicable requirements of N.J.A.C. 7:8 and N.J.A.C. 7:13.

Stormwater management features include a pervious pavement system, a StormTrap® underground detention basin, and multiple Kraken Filter manufactured treatment devices at Signature East, and three StormTrap® underground detention systems, four pervious pavement areas, and multiple Kraken Filter manufactured treatment devices at Signature South. These design measures attenuate and treat stormwater runoff to maintain compliance with applicable state performance standards. The post-construction peak runoff rates for the 2, 10, and 100-year storm events are designed to meet 50, 75, and 80 percent, respectively, of the pre-construction peak runoff rates, while accounting for both the current and future (year 2100) rainfall volumes. Compliance with N.J.A.C. 7:8 requires that post-development peak stormwater runoff rates do not exceed pre-development rates, ensuring that the Proposed Action would not increase flood risk to surrounding areas.

With respect to the Rebuild by Design (RBD) Meadowlands program, the Proposed Action and the RBD Meadowlands project address different components of regional flood risk. The RBD Meadowlands project focuses on community-level flood protection infrastructure, including pump stations and channel improvements to the East Riser Ditch, while the Proposed Action addresses stormwater management within the Airport boundary through engineered detention and treatment systems. In addition, the Proposed Action's stormwater management design ensures that post-development runoff is controlled to rates at or below pre-development conditions and therefore would not increase flood volumes conveyed to the East or West Riser Ditches or to the broader drainage system. Accordingly, while the Proposed Action and the RBD Meadowlands project utilize different approaches, both share the objective of reducing flood risks and improving flood resilience for surrounding communities. Based on the analyses documented in the EA, the Proposed Action is consistent with those objectives and would not adversely affect the flood mitigation benefits of the Rebuild by Design Meadowlands program.

All proposed buildings have been designed with first-floor elevations of a minimum of one foot above the regulatory flood hazard area elevation of 8.0 feet (NAVD88), consistent with N.J.A.C. 7:13-12.5. The proposed first-floor elevations are 9.0 feet (NAVD88) at Signature South and 9.0 feet (NAVD88) at Signature East. Portions of the site will remain below the floodplain in the proposed condition allowing overland flow of stormwater to enter and exit the project area. Accordingly, the Proposed Action would not result in a significant floodplain encroachment because it would not cause notable adverse impacts to the natural and beneficial values of the floodplain, increase flood hazards or risks to human life, or result in floodplain-related damage substantial in cost or extent. Therefore, construction and operation of the Proposed Action would not result in a significant impact to floodplains. Additional information on the proposed stormwater management systems is provided in Appendix M.

TR-12 WATER RESOURCES – WETLANDS

Summary:

Commenters expressed concern that the Proposed Action would adversely affect wetlands and associated habitat and damage valuable wetland ecosystems. Several commenters requested that impacts on wetlands be avoided or minimized to the maximum extent practicable in accordance with applicable federal requirements.

Response:

Signature assessed the impacts to wetlands in accordance with FAA Order 1050.1G; Section 404(b)(1) Guidelines of the Clean Water Act (CWA); EO 11990, *Protection of Wetlands*; DOT Order 5660.1A, *Preservation of the Nation's Wetlands*.

An analysis of alternatives to avoid, minimize, and compensate for impacts to wetlands was completed in accordance with Section 404(b)(1) of the CWA and consistent with EO 11990, and DOT Order 5660.1A. However, no avoidance alternatives were identified that met the project's purpose and need (see Appendix K). As shown in Table 4-8 of the

EA, the Proposed Action configuration for both Signature East and Signature South minimize impacts on wetland resources relative to the other action alternative configurations. Further, since publication of the Draft EA, the footprint of the Proposed Action has been reduced to minimize wetland impacts from 11.0 acres to 10.9 acres. Additional information regarding wetland impact minimization is included in Appendix K. Please also see Section 4.8.3 for the revisions made since publication of the Draft EA.

Despite these avoidance and minimization efforts, the Proposed Action would directly impact 10.9 acres of wetlands located within the limits of the highly developed landscape of Airport property. The Airport and the wetlands within its limits are drained by ditches that convey water to the East Riser Ditch[19] or drainage ditches that direct water to an offsite tide gate before conveying water to the tidal portion of Berrys Creek. Wetland areas are actively managed by Airport staff in accordance with an FAA-approved WHMP, developed under FAA AC 150/5200-33C, to deter wildlife from Airport property where the Proposed Action is located. The approved WHMP includes measures to regularly trim and maintain vegetation within Airport property to discourage wildlife from posing a hazard to aircraft operations and public safety.

Approximately 3.82 acres of wetlands would be directly impacted as a result of development at the proposed Signature East site. These wetlands consist of 3.22 acres of forested/shrub wetlands, 0.59 acres of freshwater emergent, and 0.01 acres of managed wetland in maintained lawn. They lie outside Teterboro Woods and are surrounded by Airport development, including Airport runways to the west and south, the New Jersey Aviation Hall of Fame, a road to the east, and the Signature facility to the north. They are also routinely subject to runoff from nearby paved surfaces. The non-forested wetlands are dominated by non-native invasive species such as common reed (*Phragmites australis*), which are not rare or unique in the New Jersey Meadowlands.[20] The forested area consists of young trees that are routinely topped to maintain line of sight from the nearby FAA airport traffic control tower and to prevent penetration of critical air navigation surfaces associated with TEB runways.

Approximately 7.08 acres of wetlands would be directly impacted as a result of development at the proposed Signature South site: 0.89 acres of forested/shrub, 5.78 acres of freshwater emergent, and 0.41 acres of managed wetland in maintained lawn. Similar to the wetlands at Signature East, the wetlands are surrounded by Airport development and regularly subject to runoff from paved surfaces nearby, including aircraft parking aprons, active taxiways, and Airport service roads. The non-forested wetlands are also dominated by the common reed (*Phragmites australis*). The forested wetlands are isolated and surrounded by a matrix of emergent Phragmites-dominated wetland and Airport development. Trees and vegetation are regularly maintained to comply with the FAA-approved WHMP, which includes measures to control the growth of vegetation through topping and trimming to ensure the safety of aircraft and their passengers.

The wetlands present at the proposed Signature East and Signature South sites do not exhibit the characteristics of unique, rare, or ecologically significant wetlands. The wetlands are dominated by non-native invasive species. While many commenters expressed concern over the value of forested wetlands, not all forested wetlands possess the same functions and values, and many wetlands vary in their ability to protect, maintain, or enhance the quality of the nation's waters. Specific forested wetland characteristics such as the size of the forest patch, its location, amount of forest edge, age, disturbance history, surrounding land use, presence of invasive species, and fragmentation are factors that can degrade or lessen the values attributed to a forested wetland. The forested wetlands in areas proposed for development lie within the limits of the highly developed landscape of the Airport and are degraded. The forested wetlands are stunted in growth by a combination of prior land use (i.e., grading, stockpiling, etc.),

[19] East Riser Ditch is a large ditch that borders the western edge of Teterboro Woods.

[20] US Fish and Wildlife Service, Phragmites, https://www.fws.gov/media/phragmites-1 (accessed April 13, 2026). Phragmites australis, also known as common reed, is a perennial, aggressive wetland grass. Invasive phragmites create tall, dense stands which degrade wetlands and coastal areas by crowding out native plants and displacing native animals.

vegetation management (i.e., cutting), hydrology, soils (i.e., nutrient depauperate), and local environmental conditions (i.e., both sites are adjacent to jet airplane parking and taxiing areas that experience significant impacts from jet engine exhaust). By definition, the functions and values associated with degraded wetlands are compromised relative to non-degraded wetlands, resulting in a reduction of available ecosystem services compared to higher-functioning wetland systems, such as those identified for mitigation in Table 4-9 of Section 4.8.3.3 of the EA.

As noted in Section 4.8.3.3 of the EA, off-site wetlands mitigation would be performed to compensate for the on-site jurisdictional wetland impacts. Specifically, development at both Signature East and Signature South would require mitigation of 6.79 acres of palustrine emergent (PEM) wetland impacts (6.37 acres of freshwater emergent and 0.42 acres of managed wetland in maintained lawn) and 4.11 acres of palustrine forested/scrub-shrub (PFO/PSS) wetland impacts (3.43 acres of palustrine forested and 0.68 acres of palustrine scrub-shrub wetlands). Signature has taken a watershed-based approach to mitigating impacts on wetlands. The proposed compensatory wetland mitigation would occur through the purchase of credits at off-site mitigation sites which occur within the same watershed and outside of an active airport environment. Therefore, the wetlands associated with the proposed mitigation areas are anticipated to provide functions and values that exceed those provided by the wetlands proposed to be impacted by the Proposed Action. The mitigation bankers are required to steward the mitigation sites until the last credits are sold and then convey the wetland to a land steward with an endowment so that the care of the mitigation site will continue.

Impacts to wetlands as a result of the Proposed Action will be mitigated and compensated for in accordance with the CWA Section 404(b)(1) as administered by the US Army Corps of Engineers, as well as in accordance with Executive Order 11990, and DOT Order 5660.1A. Compensatory mitigation is described in detail in Section 4.8.3.3 of the EA. As described above, the wetlands proposed for development are degraded, dominated by invasive species, and provide diminished ecological functions and values relative to non-degraded wetland systems. The proposed compensatory mitigation would preserve and enhance higher-functioning wetlands within the same watershed, outside of the Airport environment, resulting in a net improvement in wetland quality relative to the wetlands proposed to be impacted. For additional information regarding impacts to biological resources and habitat, see Topical Response TR-9.

TR-13 WATER RESOURCES – SURFACE WATERS

Summary:

Commenters expressed concern that the Proposed Action would degrade surface waters through increased stormwater runoff and pollutant loading. Several commenters questioned the potential for additional runoff and toxic pollutants to adversely affect nearby waterways and water quality.

Response:

In accordance with FAA Order 1050.1G, Signature evaluated the Proposed Action's potential impacts to surface water resources within the project area, which drain to the East Riser Ditch and Berrys Creek, tributaries of the Hackensack River. NJDEP, which holds regulatory authority over surface water resources in the project area, was consulted throughout preparation of the EA.

The Proposed Action would increase impervious surface within the project area but would not substantially alter existing drainage patterns. Because the net increase in impervious surface exceeds one-quarter acre, the Proposed Action qualifies as a major development under the Stormwater Management Rules, N.J.A.C. 7:8, which requires a stormwater management system designed to remove 80 percent of total suspended solids (TSS) from runoff. The proposed design meets this standard through NJDEP-approved manufactured treatment devices and pervious pavement systems designed in accordance with N.J.A.C. 7:8-5.5(b), including a liner and underdrain, a maximum 3:1

contributory drainage area ratio, and a maximum 72-hour drainage time. In addition, runoff from the Proposed Action will be directed through NJDEP-approved manufactured treatment devices prior to discharge, reducing the potential risk of pollutants to adversely affect nearby waterways and water quality. Additional details on these strategies are provided in Appendix M of the EA.

Consistent with N.J.A.C. 7:8-5.6, analyses were conducted and are documented in the Engineering Reports (see Appendix M of the EA) submitted with the permit applications, to evaluate the increased volume of stormwater runoff associated with the new impervious surfaces at both Signature East and Signature South. The analysis demonstrated that the additional runoff would not increase flooding below the point of discharge and that the proposed measures meet or exceed the requirements of all reviewing jurisdictional agencies. Consistent with N.J.A.C. 7:8-5.4, groundwater recharge was determined not to be required due to the presence of existing Hydrologic Soil Group (HSG) D soils at the project sites which currently do not recharge groundwater. Additionally, geotechnical investigations confirmed high groundwater levels, mottling, and water seepage indicating seasonal saturation and limited infiltration capacity precluding recharge to underlying resources. During construction, erosion and sediment control measures would be implemented in accordance with the Standards for Soil Erosion and Sediment Control in New Jersey (N.J.A.C. 2:90) to prevent construction-related discharges from adversely affecting surface water quality.

Stormwater management reports and associated plans for the Proposed Action were submitted to NJDEP as part of the flood hazard permit applications, as the Proposed Action is required to demonstrate compliance with N.J.A.C. 7:8 for runoff control, water quality treatment, and groundwater recharge. Adherence to these permit-related operational measures, together with the designed stormwater drainage systems, would further reduce the risk that applicable water quality standards would be violated or that a public drinking water supply would be contaminated. NJDEP issued the Flood Hazard Area Verification, Flood Hazard Area Individual Permit, and Meadowlands District Water Quality Certificate for the proposed project on July 16, 2026 (see Appendix R).

Because portions of the existing project area currently lack formal stormwater treatment infrastructure, the proposed stormwater management systems would represent an improvement in water quality protection compared to existing conditions. Based on this analysis, the Proposed Action would not be expected to result in significant impacts to stormwater runoff or water quality. For additional information on stormwater management in the context of floodplain impacts, see Topical Response TR-11; impacts to wetland resources are addressed in Topical Response TR-12.

TR-14 ENVIRONMENTAL JUSTICE/CLIMATE CHANGE

Summary:

Commenters expressed concern regarding the Proposed Action's potential impacts on environmental justice communities and its relationship to climate change.

Response:

Consistent with FAA Order 1050.1G, Signature and the Port Authority considered all reasonably foreseeable environmental effects of the Proposed Action, the action alternatives, and the No Action Alternative. FAA Order 1050.1G does not identify climate or environmental justice as a separate environmental impact category for analysis. Accordingly, environmental justice or climate are not evaluated as a standalone resource in this EA.

TR-15 CUMULATIVE EFFECTS

Summary:

Commenters expressed concern regarding the cumulative environmental effects of continued development in the Meadowlands region, including future development at the Airport.

Response:

Signature and the Port Authority prepared the EA in accordance with Section 102 of NEPA,[21] DOT Order 5610.1D, and FAA Orders 1050.1G and 5050.4B. In response to the Council on Environmental Quality (CEQ) memorandum issued on February 19, 2025,[22] federal agencies revised or established new NEPA implementing procedures. The CEQ memorandum directs federal agencies to evaluate the reasonably foreseeable effects of a proposed action consistent with Section 102 of NEPA, which does not use the term cumulative effects but instead requires consideration of all reasonably foreseeable effects, regardless of whether they could be characterized as cumulative. CEQ finalized the rescission of its regulations on January 8, 2026. Consistent with this direction, FAA Order 1050.1G does not require a separate cumulative effects analysis to satisfy NEPA.

As documented in Section 4 of the EA, Signature and the Port Authority considered the reasonably foreseeable environmental effects of the Proposed Action, the reasonable alternatives, and the No Action Alternative, including the effects of projects proposed by the Port Authority at TEB that are reasonably expected to occur within the next five years. The EA does not evaluate projects outside TEB property or projects anticipated to occur beyond this timeframe because any environmental effects associated with those projects do not have a reasonably close causal relationship to the Proposed Action and would therefore be speculative. Likewise, the EA does not include projects proposed or initiated by parties other than the Port Authority or Signature because implementation of those projects is uncertain and dependent on future economic and other factors.

The Port Authority identified four reasonably foreseeable future projects at TEB that are expected to occur within the next five years: (1) Rehabilitation of Various Taxiways and the Hangar 1 Ramp; (2) Installation of an Aircraft Run-up Pad; (3) Airport Perimeter Fencing; and (4) Runway 6 Departure Engineered Materials Arresting System (EMAS). Additional information on these projects is provided in Appendix N (Footnotes 38 through 41). The potential environmental effects of these future projects were considered in the evaluation of each environmental resource presented in Section 4 of the EA.

TR-16 GENERAL PROJECT SUPPORT

Summary:

A number of commenters expressed support for the Proposed Action. Reasons stated by commenters included:

- representing a significant private investment in New Jersey's infrastructure that addresses both current operational challenges and future demand at Teterboro Airport;
- creating employment opportunities, including approximately 300 construction jobs and permanent aviation-related positions, utilizing union labor;
- modernizing existing airport facilities to better accommodate today's aircraft fleet, improve aircraft parking and circulation, and reduce ramp congestion;
- improving safety and operational efficiency at one of the region's most important transportation assets;
- reducing unnecessary ferry flights that place additional strain on regional airspace and supporting the long-term functionality of Teterboro Airport;

[21] National Environmental Policy Act, 42 U.S.C. § 4331 (1969).

[22] Executive Office of the President, Council on Environmental Quality, Memorandum for Heads of Federal Departments and Agencies, I*mplementation of the National Environmental Policy Act*, February 19, 2025.

- including meaningful stormwater management, wetlands mitigation, and drainage improvements that will enhance environmental performance and leave the site in better condition; and
- strengthening critical infrastructure, supporting additional economic activity throughout the region, and contributing to the long-term economic vitality of surrounding communities.

Response:

The support for the Proposed Action expressed by commenters is acknowledged. As described in the Draft EA, the Proposed Action would modernize Signature Aviation's existing facilities at TEB to accommodate the existing and forecast aircraft fleet, improve aircraft parking and circulation, and reduce ramp congestion and unnecessary ferry flights. The Proposed Action represents a significant private investment in New Jersey's aviation infrastructure and is anticipated to generate approximately 300 construction jobs utilizing union labor, as well as support permanent aviation-related employment at the Airport. In addition, the Proposed Action includes stormwater management, wetlands mitigation, and drainage improvements intended to enhance environmental conditions at the project site. The comments expressing support have been noted and are included in the administrative record for the EA.

TR-17 GENERAL OPPOSITION OR CONCERN

Summary:

Several commenters expressed opposition to or concern about the Proposed Action. Concerns raised by commenters included:

- concern that the Proposed Action would result in the destruction of 11 acres of wetlands within the ecologically sensitive Meadowlands ecosystem;
- concern that wetlands loss would adversely affect wildlife, including threatened and endangered species;
- concern that the removal of wetlands would increase the risk of flooding in surrounding communities;
- concern that the Proposed Action would degrade water quality and downstream waterways;
- concern that the project primarily benefits private aviation interests and does not serve a genuine public need; and
- opposition to the Proposed Action and requests that the Port Authority deny approval and pursue alternatives that avoid wetland destruction.

Response:

The concerns and opposition expressed by commenters are acknowledged. The Draft EA evaluates the potential environmental effects of the Proposed Action across all applicable resource categories, including those raised by commenters. Concerns regarding wetland impacts, including proposed mitigation measures, are addressed in Topical Response TR-12. Concerns regarding impacts on biological resources are addressed in Topical Response TR-9. Concerns regarding floodplain impacts and flood risk are addressed in Topical Response TR-11, and concerns regarding surface water quality are addressed in Topical Response TR-13. Concerns regarding the public purpose of the Proposed Action and the Airport's economic contributions are addressed in Topical Responses TR-1 and TR-4. Alternatives considered to avoid or minimize impacts are discussed in Topical Response TR-6. Environmental justice and climate change considerations are addressed in Topical Response TR-14. The comments expressing opposition have been noted and are included in the administrative record for the EA.

INDIVIDUAL RESPONSES

AF001 US FISH AND WILDLIFE SERVICE
ANDERSEN, TROY M.

AF001-1

Comment:

The U.S. Fish and Wildlife Service's New Jersey Field Office has completed its review of the documentation prepared for the Federal Aviation Administration's Facilities Redevelopment Project at Teterboro Airport Environmental Assessment. We appreciate the opportunity to participate as a cooperating agency throughout this process. We have received your May 27, 2026, responses to our comments and have no further comments.

For any further questions, please contact me at 804-728-0695.

Response:

Comment noted.

AF002 US ENVIRONMENTAL PROTECTION AGENCY
AUSTIN, MARK

AF002-1

Comment:

The United States Environmental Protection Agency (EPA) has reviewed the Draft Environmental Assessment (EA) for the Facilities Redevelopment Project at Teterboro Airport in Bergen County, New Jersey (the Project or Proposed Action). Pursuant to the National Environmental Policy Act (NEPA) and our NEPA review authority under Section 309 of the Clean Air Act, 42 U.S.C. § 7609, EPA reviews and comments on the environmental impact of any proposed federal action subject to NEPA's requirements.

The EPA has served as a Cooperating Agency during the development of the EA. To date, we have provided comments on earlier iterations of the document, including the Preliminary Purpose and Need (September 11, 2025), Alternatives (November 6, 2025) and the Preliminary Draft EA (April 13, 2026). We appreciate the opportunity to review the Draft EA and offer the enclosed comments for your consideration.

If you have any questions regarding these comments, please contact Samantha Nyer at

Nyer.Samantha@epa.gov or (212) 637-3666.

Response:

Comment noted.

AF002-2

Comment:

General Comments

Statutory Authorities and Regulations: 42 U.S.C. § 7609; 42 U.S.C. § 4321 et seq.; 33 U.S.C. § 1344; 40 C.F.R. Part 230, Subpart B (404(b)(1) Guidelines)

To strengthen the alternatives analysis, and improve transparency regarding the basis for alternative selection, we recommend:

- A clear discussion of any environmental and operational tradeoffs between alternative configurations that led to the ultimate selection of the facilities that comprise the preferred alternatives.
- Clarify the basis for facility sizing factors used in the alternatives screening process and selection. The EA indicates that configurations within 10% of the identified 2044 facility requirements could satisfy the Project objectives. Additionally, the facility components included in the preferred alternatives exceed the 2044 space requirements (Table 3.4 of the EA).
  - Given that the EA demonstrates that smaller facilities than those ultimately selected were deemed to be operationally viable, we recommend that additional justification for the larger facility footprint be provided. Such information would improve transparency regarding the alternatives evaluation process and support the basis for selection of the preferred alternatives under NEPA and the Clean Water Act.

Response:

FAA Order 1050.1G requires a thorough and objective evaluation of the Proposed Action, the No Action Alternative, and reasonable alternatives commensurate with the nature of the proposed project and the environmental issues involved. Consistent with these requirements, Section 3 and Appendix D of the EA evaluate seven alternatives to the Proposed Action, including three non-development alternatives and four development alternatives. Each alternative was screened based on its ability to meet the Purpose and Need and its operational and engineering feasibility. Alternatives that satisfied these screening criteria were carried forward for detailed environmental analysis. As documented in Section 3.5 of the EA, Alternative 5 (Configurations 2 through 5) and Alternative 6 (Configurations 2 through 7) met the screening criteria and were retained for detailed evaluation of environmental impacts.

The facility requirements used to evaluate the alternatives were developed using FAA AC 150/5300-13B and ACRP Report 113 based on the projected number and types of aircraft anticipated to use Signature's facilities. Requirements were developed for each functional area of the Signature East and Signature South facilities to identify existing and future deficiencies in aircraft parking, terminal space, and vehicle parking. The resulting facility requirements represent planning-level space needs used to evaluate alternatives and are not intended to establish fixed design footprints. Because final site layouts must also account for existing site constraints, FAA design standards, aircraft maneuvering requirements, and operational functionality, alternatives were considered to satisfy the identified facility requirements if the overall functional areas were within approximately 10 percent of the projected 2044 planning-level requirements.[23] While individual facility components may differ from the planning-level requirements in Table 3-4 due to topography, site constraints, and constructability factors, the Proposed Action overall remains approximately 67,600 square feet below the combined 2044 facility requirements identified in Table 3-4, including approximately 22,100 square feet under at Signature East and approximately 45,500 square feet under at Signature South.

Aircraft parking capacity is provided by a combination of apron pavement and hangar space. Accordingly, these components were evaluated together, rather than independently, because they serve the same functional purpose of accommodating aircraft. While individual alternatives may provide slightly more or less apron or hangar area than the planning-level facility requirements, the combined aircraft parking areas were used to determine whether an alternative could accommodate the projected demand while maintaining safe and efficient aircraft operations. The proposed FBO terminal space and automobile parking are functionally integral to apron and hangar operations and must be located at the ramp edge to serve arriving and departing aircraft. As documented in EA Sections 3.3.4

[23] Alternative 6, Configuration 6 of the proposed development at Signature South is within the 10 percent tolerance of the minimum total facilities requirement identified in Table 3-8 of the Final EA when considering off-site vehicle parking.

and 3.3.7, no practicable alternative on-Airport locations were identified for these functions. Additionally, the Signature South FBO terminal incorporates a two-story design to provide the required operational floor area while minimizing the building's ground-disturbance footprint.

As documented in Tables 3-2 and 3-3 of the EA, Alternative 5, Configuration 5 and Alternative 6, Configuration 6 (the Proposed Action) represent the smallest development footprints among the reasonable action alternatives that satisfy the Purpose and Need. The preferred configurations were selected because they provide sufficient operational capacity while minimizing environmental impacts, including impacts to wetlands, relative to the other action alternatives.

Consistent with FAA Order 1050.1G, EO 11990, *Protection of Wetlands*, DOT Order 5660.1A, *Preservation of the Nation's Wetlands*, the Clean Water Act Section 404(b)(1) Guidelines, and other applicable federal requirements, the EA evaluated alternatives to avoid and minimize impacts to wetlands. As documented in Appendix K, no practicable avoidance alternative was identified that would meet the Purpose and Need. However, the preferred configurations minimize wetland impacts relative to the other reasonable development alternatives evaluated (see Table 4-8). Since publication of the Draft EA, the footprint of the Proposed Action has been further refined to reduce permanent wetland impacts from 11.0 acres to 10.9 acres (see also Topical Response TR-12). The Final EA has also been revised to clarify the basis for the facility sizing assumptions, the alternatives screening process, and the environmental and operational considerations supporting selection of the Proposed Action. Please also see Section 1.1 for a summary of revisions made since publication of the Draft EA.

AF002-3

Comment:

Air Quality

Statutory Authorities and Regulations: 42 U.S.C § 7609; 42 U.S.C. § 4321 et seq.; 42 U.S.C. § 7506 (c); 40 C.F.R. Part 93, Subpart B

EPA recommends that the EA include further details on operational emissions and potential benefits associated with the Project to strengthen the basis for the EA's conclusions on air quality impacts. We offer the following suggestions:

- Clarify assumptions regarding future aircraft operations under the No Action and Proposed Action to resolve inconsistent statements throughout the EA as needed.
- Provide a more comprehensive discussion of the operational emissions associated with the Proposed Action, including changes in aircraft taxiing, idling, ferry flights, aircraft repositioning, ground support and vehicle traffic.
- The EA identifies operational efficiencies as a benefit of the Project, including reduced ferry flights. While precise quantification of these reductions may be infeasible, a qualitative discussion of the anticipated benefits associated with any operational efficiencies in addition to reduced congestion and ferry flights would provide a more complete assessment of the environmental effects of the Proposed Action.

Response:

As documented in Section 4.3.3.1 of the EA, operational air emissions were evaluated qualitatively in accordance with FAA Order 1050.1G because the Proposed Action would not induce new aviation demand or increase aircraft operations beyond those forecast to occur at TEB under the No Action Alternative. The FAA-approved aviation activity forecast (Appendix A) projects that demand for Signature facilities will continue to increase regardless of whether the Proposed Action is implemented. Accordingly, the same forecast demand was used for both the No

Action Alternative and the Proposed Action. The Final EA has been revised to clarify this assumption and improve consistency throughout the document.

As discussed in Sections 2.2.3, 2.2.4, and 4.3.3.1 of the EA, existing deficiencies at the Signature East and Signature South leaseholds contribute to apron congestion, aircraft repositioning, extended taxiing and idling on the apron, and unnecessary ferry flights. These conditions increase aircraft engine and auxiliary power unit operating time, require additional ground support activities, and contribute to localized air emissions. Ferry flights also generate two additional aircraft operations for each aircraft repositioning event and contribute to congestion within the Airport movement area and the surrounding metropolitan airspace.

The Proposed Action would improve aircraft parking and circulation, reducing the need for aircraft repositioning on the apron and eliminating the operational conditions that necessitate ferry flights. These operational improvements are expected to reduce aircraft taxiing, idling, and auxiliary power unit use associated with apron congestion, improve the efficiency of aircraft movements on the Signature leaseholds, and reduce congestion within the Airport movement area. While these operational efficiencies cannot be quantified with sufficient precision for emissions modeling, they represent qualitative air quality benefits relative to the No Action Alternative.

In addition to these broader operational efficiencies, the elimination of ferry flights provides a quantifiable measure of the Proposed Action's air quality benefit. Based on the projected ferry flight analysis, the Proposed Action is expected to result in approximately 2.6 percent fewer total Airport operations and 3.4 percent fewer Signature operations than the No Action Alternative, with a corresponding reduction in associated aircraft emissions. Ferry flight operations are assumed to be effectively eliminated following completion of the proposed improvements, which is anticipated by 2028.

The Final EA has been revised to incorporate additional discussion regarding the anticipated benefits associated with the operational efficiencies in addition to reduced congestion and ferry flights.

AF003 US ARMY CORPS OF ENGINEERS
KOCSIK, ZACHARY

AF003-1

Comment:

The U.S. Army Corps of Engineers (USACE) has reviewed the Draft Environmental Assessment (DEA) prepared by Ricondo for the Facilities Redevelopment Project at Teterboro Airport (TEB). Please see our comments below.

The proposed purchase of credits at the GreenVest Guarini Tract Mitigation Bank is confusing. The bank does not yet exist and is still in its permitting phase, thus there are no credits currently available for purchase. It is unknown if when permitted it will have enough credits released to cover the 3.43 needed. It may take quite a while for the bank, if approved, to have enough credits released to provide the amount needed. Work would not be able to start until all credits are purchased and proof of purchase provided. Is there a secondary plan for mitigation should the GreenVest plan not be sufficient?

Response:

Section 4.8.3.3 of the EA states that wetland compensation for forested wetlands will be satisfied through the purchase of 3.43 credits at the Upper Penhorn Creek Mitigation Bank. GreenVest has applied to establish the Upper Penhorn Creek Mitigation Bank at the Guarini Tract, which is currently being reviewed by the Meadowlands Interagency Mitigation Advisory Committee, which consists of representatives from USACE, NJDEP, USEPA, USFWS,

National Oceanic and Atmospheric Administration (NOAA), and NJSEA. This bank does not include any wetland creation in its credit generation.[24] The bank relies primarily on wetland enhancement to generate wetland credits, seeking to enhance 51.44 acres of degraded emergent wetlands, enhance 13.53 acres of degraded forested / scrub-shrub wetlands, preserve 1.29 acres of forested wetlands, and preserve 5.75 acres of open water. Wetland habitat at the GreenVest Guarini Tract site will be categorized as enhancement or preservation pursuant to 33 CFR § 332. GreenVest will apply a 3:1 ratio to generate 1 credit for those portions of the bank proposed for wetland enhancement which covers almost all of the bank. Accordingly, 10.29 acres of palustrine forested wetlands will be developed through wetland enhancement, resulting in 3.43 credits available based on the aforementioned 3:1 ratio. Therefore, the proposed purchase of 3.43 credits represents three acres of forested palustrine wetlands for every one acre permanently impacted from the Proposed Action. GreenVest is in the process of obtaining final signatures from the US Army Corps of Engineers and New Jersey Department of Environmental Protection regarding the Upper Penhorn Creek Mitigation Bank's approval. It is anticipated that a Section 404 permit issued by the USACE would include compensatory mitigation requirements and stipulations stating that construction cannot commence until an approved mitigation plan is in place. Importantly, 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" mitigation site that would enhance 10.29 acres of degraded palustrine forested wetlands within the limits of the proposed mitigation bank. GreenVest will secure any necessary local, State, and Federal licenses, permits, approvals, and consents required to perform compensatory mitigation at this site. Additionally, GreenVest has already provided "turnkey" mitigation for other entities requiring compensatory mitigation at this site. The Final EA has been revised to clarify the proposed wetlands mitigation.

AS001 NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION CARTER, RYAN

AS001-1

Comment:

Thank you again for the opportunity to comment on the EA. The NJDEP has one comment after reviewing the Response-to-Comments matrix, from our NJ Fish and Wildlife program.

NJ Fish and Wildlife: Kelly Davis (Kelly.Davis@dep.nj.gov)

- NJFW continues to recommend the use of a filtration system which also removes petroleum based materials. On the ConTech website there are 3 filter options. The Jellyfish Filter spec pages indicate oil removal. The Stormwater Filter spec pages indicate oil & grease removal. The High Capacity Kraken Filter spec page does not. If you have any questions, please contact Kelly Davis.

If you have any questions outside of the above comments or need anything else from the NJDEP, please let me know. Thank you.

Response:

Signature has reviewed the additional filtration options and has discussed available treatment options with the manufacturer to address petroleum removal concerns. However, at this time, NJDEP does not certify stormwater manufactured treatment devices (MTDs) for hydrocarbon (oil) removal, as hydrocarbon removal is outside the scope of NJDEP's verification testing program. The proposed High-Capacity Kraken Filters meet the required NJDEP Total Suspended Solids (TSS) removal performance criteria for water quality measures, in adherence with N.J.A.C. 7:8-

[24] GreenVest LLC, Prospectus, Upper Penhorn Creek Mitigation Bank. *Freshwater Wetland Enhancement and Preservation*. Revised November 2024.

5.5(b). However, the JellyFish Filter referenced in the comment is not included on the NJDEP pre-certified MTD list and would therefore not be a suitable substitute from a water quality treatment perspective. Additionally, alternative units on the NJDEP-approved list would similarly lack a specific hydrocarbon removal certification. NJDEP issued the Flood Hazard Area Individual Permit and Meadowlands District Water Quality Certificate for the proposed project on July 16, 2026.

To address the concern regarding petroleum-based materials, Signature is evaluating an oil-control feature for incorporation into the inlets or manholes, upstream of the NJDEP-approved units. This could include an oil baffle wall and sump within the proposed structures or a more advanced oil-water separator or filter-based pretreatment system. Such a feature would intercept petroleum-based pollutants before stormwater runoff reaches the downstream water quality treatment units.

To further reduce any risk that applicable water quality standards would be violated, the Proposed Action and its action alternatives would adhere to a project-specific Stormwater Pollution Prevention Plan (SWPPP) and implementation of USEPA minimum control measures and standard best management practices (BMPs) during construction, as well as permit-related operational measures for discharges and implementation of adequate stormwater drainage systems.

EO001 TOWNSHIP OF SOUTH HACKENSACK
BRUGGER, GARY C.

EO001-1

Comment:

On behalf of the South Hackensack Mayor and Township Committee please accept these comments with regards to the above-mentioned project.

Township Committeewoman Yris Encarnacion and I, Gary Brugger, attended the Public Workshop on June 17, 2026. This workshop was very informative, and we appreciated the time and effort that FBO Signature Airlines along with the PANY&NJ put into this event.

Response:

Comment noted.

EO001-2

Comment:

We are very disappointed that this expansion project does not address the condition of the East Riser drainge ditch along Fred Wehran Drive. As everyone is aware, this ditch is in horrendous condition and any further coverage of impervious area within the confines of Teterboro Airport will have an impact on this ditch and our town. We have long experienced flooding conditions that have cost our community, and our community's residents, hardship, and financial loss. Because of the actions of Teterboro Airport over the last few decades, with regards to environmental issues and their refusal to upgrade and fix this ditch, our town, along with neighboring towns, suffer the consequences.

The management of Teterboro has done a great job cleaning and improving the capacity of the ditch within the confines of the "Protected Zone" inside the airport but the East Riser ditch from Rt. 46 to the fenced in secure area, has all but been abandoned by Teterboro Airport. As noted on the maps that were displayed at the workshop, the East Riser ditch is within the property limits of the airport and under their control.

When the new FAA Control Tower was erected, the ditch was widened and deepened to allow for this needed safety improvement. A new acess bridge to this new facility was constructed over the ditch, which is higher and wider. So obviously, when this ditch gets improved, it happens.

The current condition of the ditch can only be described as unsafe and environmentally neglected. Aside from no safety barriers along this ditch which has a private road and public road on either side, there are not even curbs to prevent debris from entering this section of the ditch. The problem with this ditch started decades ago with the redirection of this ditch inside the airport's protected zone, to allow for extended runways and taxiways. This severely restricted the natural flow of the ditch which is now clogged with sediment and vegetation. There are also two bridges across the ditch in the neglected area that also restrict flow during rain events.

Response:

As described in Section 2.3 of the EA, the Proposed Action consists of proposed development at Signature East and Signature South leaseholds through the construction of aircraft apron, hangars, and associated support facilities on existing Airport property. Improvements to the East Riser drainage ditch are not part of the Proposed Action and, therefore, are outside the scope of this EA.

The EA evaluated the potential effects of the Proposed Action on stormwater management, surface waters, and floodplains in accordance with FAA Order 1050.1G, EO 11988, DOT Order 5650.2, and the New Jersey Stormwater Management Rules (N.J.A.C. 7:8). Although the Proposed Action would increase impervious surface at the Airport, the proposed development would not substantially alter existing drainage patterns or result in significant impacts to stormwater management or flood hazards. Because the net increase in impervious surface exceeds one-quarter acre, the Proposed Action qualifies as a major development under N.J.A.C. 7:8 and is therefore required to incorporate stormwater management measures that meet or exceed applicable state performance standards. As described in Section 4.8.3.3 and Appendix M of the EA, the Proposed Action includes engineered stormwater management features, including underground detention systems and pervious pavement, that are designed to reduce runoff rates, improve water quality, and attenuate stormwater flows. Hydrologic and hydraulic analyses documented in the Engineering Reports (see Appendix M) demonstrate that runoff associated with the Proposed Action would not increase flood damage downstream of the points of discharge.

Accordingly, while the condition and maintenance of the East Riser drainage ditch are outside the scope of the Proposed Action, the analyses documented in the EA demonstrate that the Proposed Action would not increase downstream flood risk or result in significant impacts to stormwater management, surface waters, or floodplains. See also Topical Responses TR-11 and TR-12.

EO001-3

Comment:

We understand and appreciate that the proposed improvements will benefit Teterboro Airport and Signature Airlines. In reality, this project along with other previous projects on the airport property, has brought financial gain to Teterboro Airport and the FBO's, the environmental impact due to increased flooding cannot be ignored any longer.

Response:

As described in Section 2 of the EA, demand for Signature's facilities currently exceeds available aircraft parking, resulting in apron congestion, increased aircraft idling, unnecessary ferry flights, and operational inefficiencies that affect the safe and efficient movement of aircraft. Without the Proposed Action, these operational deficiencies are

expected to persist and worsen as demand for business aviation at the Airport continues to increase, as documented in the FAA-approved aviation activity forecast provided in Appendix A of the EA.

Please see Response EO001-2 on the measures taken by Signature to reduce flood risks in accordance with N.J.A.C. 7:8.

EO002 MAYOR AND COUNCIL OF BOROUGH OF LITTLE FERRY RAGUESO, MAURO

EO002-1

Comment:

To Whom It May Concern,

On behalf of the Mayor and Council of the Borough of Little Ferry, we respectfully submit this letter regarding the proposed expansion at Teterboro Airport.

Response:

As described in Section 2.3 of the EA, the Proposed Action is not an expansion of the Airport. Rather, it consists of development at the existing Signature East and Signature South leaseholds for the construction of aircraft apron, hangars, and associated support facilities on existing Airport property. The Proposed Action would not expand the Airport's property boundary or operational capacity. Instead, it would provide additional aircraft parking adjacent to Signature's existing facilities to improve operational efficiency and safety and accommodate existing and forecast demand within Signature's leaseholds. The Proposed Action would not authorize additional aircraft operations or expand the Airport beyond its existing role. Please see also Topical Responses TR-1, TR-2, and TR-3.

EO002-2

Comment:

While we recognize and appreciate the important role the airport plays in supporting the surrounding economy, local businesses, and employment opportunities, we also have a responsibility to advocate for the health, safety, and quality of life of our residents.

Little Ferry has long been a community that understands the importance of balancing economic development with responsible environmental stewardship. As neighboring municipalities continue to grow, it is critical that development projects be carefully evaluated to ensure they do not create unintended consequences for the communities that surround them.

Response:

As described in Section 4 of the EA, the environmental consequences of the Proposed Action, the No Action Alternative, and other reasonable alternatives were evaluated in accordance with FAA Order 1050.1G. The analysis considered the reasonably foreseeable environmental effects of each alternative, including the type, context, intensity, and duration of potential impacts. Consistent with NEPA and FAA Order 1050.1G, the EA evaluated the applicable environmental impact categories and, as appropriate to the Proposed Action, considered both short- and long-term effects, beneficial and adverse effects, and potential effects on economic conditions and quality of life. Based on these analyses, the EA provides the information necessary for the FAA to consider the potential environmental consequences of the Proposed Action in its decision-making process.

EO002-3

Comment:

The proposed expansion raises several concerns for our governing body. Foremost among them is the potential impact associated with the loss of wetlands. These natural areas serve an important role in stormwater management and flood mitigation. Our community has experienced the devastating effects of flooding in the past, and any project that could reduce the region's natural capacity to absorb stormwater warrants careful consideration. Protecting these resources is not only an environmental issue but also a matter of public safety and community resilience.

Response:

For additional information on stormwater management in the context of floodplain impacts, see Topical Response TR-11; impacts to wetland resources are addressed in Topical Response TR-12; impacts to surface waters are addressed in Topical Response TR-13.

EO002-4

Comment:

Additionally, we are concerned about the long-term implications of expanding airport infrastructure. While this proposal may represent a single phase of development, it has the potential to establish a precedent for future expansion. As airport facilities grow, there is understandable concern that surrounding communities could experience increased aircraft activity, additional noise, and greater air pollution over time. These factors directly affect the quality of life of residents who already live in close proximity to airport operations.

Response:

As discussed in Response EO002-1, the Proposed Action is located entirely within existing Airport property and is intended to accommodate existing and forecast demand for aircraft parking. The Proposed Action would not expand the Airport's property boundary or increase its operational capacity.

The EA was prepared consistent with CEQ's February 19, 2025, memorandum and FAA Order 1050.1G. The EA evaluated the reasonably foreseeable environmental effects of the Proposed Action, the No Action Alternative, and reasonable alternatives. The analysis also considered projects at the Airport that are reasonably expected to occur within the next five years and that have a reasonably close causal relationship to the Proposed Action. Projects outside Airport property, projects anticipated beyond this timeframe, or projects proposed by parties other than the Port Authority or Signature were not evaluated because they are speculative or do not have a sufficiently close causal relationship to the Proposed Action.

As documented in Section 4 of the EA, the potential environmental effects of these reasonably foreseeable projects were considered, as appropriate, in the evaluation of each environmental resource. Based on these analyses, the EA concluded that the Proposed Action would not result in significant environmental impacts related to aircraft activity, noise, air quality, or other environmental resource categories.

EO002-5

Comment:

The Mayor and Council support responsible economic development that benefits the community. However, we believe such development must be balanced with protecting neighboring communities from unnecessary environmental impacts and preserving the character and livability of our Borough.

Response:

Consistent with NEPA and FAA Orders 1050.1G and 5050.4B, the EA evaluated the environmental consequences of the Proposed Action, the No Action Alternative, and reasonable alternatives. The Proposed Action was developed to address the documented operational deficiencies at the Signature East and Signature South leaseholds while avoiding and minimizing environmental impacts to the maximum extent practicable. As documented in Section 4

of the EA, the FAA evaluated the applicable environmental resource categories, including those affecting surrounding communities, and concluded that the Proposed Action would not result in significant environmental impacts. Where impacts could not be avoided, the Proposed Action incorporates avoidance, minimization, and mitigation measures, as appropriate, consistent with applicable federal and state requirements.

EO002-6

Decisions regarding infrastructure expansion should account not only for immediate economic benefits but also for the cumulative impacts on public health, flood mitigation, environmental resources, and the future well-being of surrounding municipalities.

Response:

Please see Responses EO002-1, EO002-4, and EO002-5.

EO002-7

We respectfully request that these concerns be given careful consideration during the review process. We encourage a thorough evaluation of the project's potential impacts and urge decision-makers to ensure that any future development reflects an appropriate balance between economic progress and the protection of the communities that call the Meadowlands home.

Thank you for your time and consideration of our comments.

Response:

As described in the responses above, the EA evaluates the potential environmental effects of the Proposed Action in accordance with NEPA, FAA Orders 1050.1G and 5050.4B, and other applicable federal, state, and local requirements. The information presented in the EA is intended to inform the FAA's decision-making process regarding the Proposed Action.

LO002 REGIONAL PLAN ASSOCIATION

BALDWIN, ZOE

LO002-1

Comment:

Regional Plan Association (RPA) appreciates the opportunity to comment on the Draft EA for the proposed Facilities Redevelopment Project at Teterboro Airport.

For more than a century, RPA has advanced policies to improve the economic competitiveness, environmental sustainability, and quality of life of the New York - New Jersey - Connecticut metropolitan region. We recognize the important role Teterboro Airport plays within the region's aviation system in supporting general aviation activity. However, we also believe public investments and federal approvals must be evaluated within the context of long-term regional resilience, responsible environmental stewardship, and sound land-use planning.

For the reasons outlined below, RPA opposes the proposed expansion and respectfully urges the FAA to prepare a full Environmental Impact Statement (EIS) rather than issue a Finding of No Significant Impact (FONSI).

Response:

As discussed in Section 2.3 of the EA, the Proposed Action is not an expansion of the Airport. Rather, it consists of development at the existing Signature East and Signature South leaseholds for the construction of aircraft apron, hangars, and associated support facilities on existing Airport property. The Proposed Action would not expand the

Airport's property boundary or operational capacity. Instead, it would provide additional aircraft parking adjacent to Signature's existing facilities to improve operational efficiency and safety and accommodate existing and forecast demand within Signature's leaseholds. The Proposed Action would not authorize additional aircraft operations or expand the Airport beyond its existing role. Please see also Topical Responses TR-1, TR-2, and TR-3.

The Proposed Action would not add runways or taxiways or otherwise increase the Airport's capacity to accommodate additional aircraft operations. As documented in Section 1.2.2 and Appendix A of the EA, future aircraft activity at TEB is driven by regional aviation demand and FAA air traffic management rather than the construction of airport facilities. The FAA-approved aviation activity forecast projects that demand for Signature's facilities will continue to increase regardless of whether the Proposed Action is implemented. The Proposed Action does not authorize additional aircraft operations. Instead, by providing additional aircraft parking and hangar capacity, it would reduce unnecessary ferry flights and result in fewer aircraft operations than would occur under the No Action Alternative.

The EA was prepared in accordance with NEPA, FAA Order 1050.1G, FAA Order 5050.4B, and other applicable federal requirements. As documented in Section 4 of the EA, the FAA evaluated the environmental consequences of the Proposed Action, the No Action Alternative, and reasonable alternatives across the applicable environmental impact categories. The EA provides the information necessary for the FAA to determine whether the Proposed Action would result in significant environmental impacts and whether preparation of an EIS is required under NEPA. Based on the analyses presented in the EA, the Proposed Action would not result in significant impacts for any of the applicable environmental resource categories.

LO002-2

Comment:

Wetland Impacts and Localized Flood Resilience

The proposed project would permanently expand aviation facilities in one of the most environmentally sensitive and flood-prone landscapes in the region. The Draft EA acknowledges that the project would require filling more than 11 acres of wetlands and calls for the construction of substantial new impervious surfaces, including new aircraft aprons, hangars, parking facilities, and access roads. While the document asserts that these impacts will be mitigated through the purchase of off-site mitigation bank credits, it overlooks the unique flood mitigation, habitat, and ecological functions these wetlands provide specifically within the immediate Meadowlands ecosystem.

Response:

Please see Topical Response TR-9 regarding biological resources. For additional information on stormwater management in the context of floodplain impacts, see Topical Response TR-11; impacts to wetland resources are addressed in Topical Response TR-12; impacts to surface waters are addressed in Topical Response TR-13.

LO002-3

Comment:

Off-site wetland mitigation may satisfy requirements of the Clean Water Act, but it does not replace the localized flood protection and resilience benefits that existing wetlands provide to surrounding communities. As climate change drives more frequent and intense weather events and accelerates sea level rise, preserving the remaining Meadowlands wetlands should be prioritized rather than treated as an afterthought addressed through off-site mitigation.

Response:

Impacts to wetland resources are addressed in Topical Response TR-12. See also Response LO002-4 regarding sea level rise.

LO002-4

Comment:

Inconsistent Climate Baselines and Deficient Flood Risk Analysis

The Draft EA also fails to adequately analyze the true impact of constructing permanent infrastructure in a location with documented and escalating flood risk. The EA acknowledges that the study area lies within the FEMA 100-year floodplain but does not account for projected sea level rise or the increased frequency of extreme weather events over the 20-year planning horizon the EA itself uses.

Infrastructure expected to serve the region for decades should be evaluated against the environmental conditions it is likely to experience over that same period. The Draft EA forecasts aviation demand through 2044 but does not apply an equivalent long-term lens to flood risk and climate resilience. This significant oversight warrants the more rigorous analysis that an EIS would provide.

Response:

Consistent with FAA Order 1050.1G, Signature and the Port Authority considered all reasonably foreseeable environmental effects of the Proposed Action, the action alternatives, and the No Action Alternative. While FAA Order 1050.1G does not identify climate change or sea level rise as a separate environmental impact category for analysis, the EA evaluates the environmental impact categories identified in FAA Order 1050.1G, including water resources (wetlands, floodplains, and stormwater), and documents that the Proposed Action and its action alternatives would not result in significant impacts to these resource categories.

With respect to flood risk, the hydrologic and hydraulic analyses documented in Appendix M of the EA evaluate stormwater management and floodplain impacts under applicable federal and state standards. The project has been designed for the N.J.A.C. 7:8 Stormwater Management rules, adopted July 17, 2023, which incorporate climate-adjusted precipitation projections into stormwater management design. The latest NJDEP standards include multiplier values increasing the historic rainfall data to account for current and future climate change. As a result, the proposed stormwater management system was evaluated using both current rainfall conditions and projected future rainfall depths representative of conditions anticipated through the year 2100. These analyses demonstrate that the Proposed Action is designed for both current and future rainfall conditions and would not increase downstream flood hazards or adversely affect surrounding communities. The Flood Hazard Area permit applications for the Proposed Action are subject to NJDEP review, which provides an independent evaluation of flood resilience under current state standards. Accordingly, the project's flood risk is evaluated not only through the EA's hydrologic analyses but also through NJDEP's permitting process, which applies the state's current regulatory framework for climate resilience. NJDEP issued the Flood Hazard Area Verification, Flood Hazard Area Individual Permit, and Meadowlands District Water Quality Certificate for the proposed project on July 16, 2026 (see Appendix R).

Under NEPA, the threshold for preparation of an EIS is whether a proposed action would result in significant environmental impacts. As documented throughout the EA, the Proposed Action would not result in significant impacts to any of the environmental resource categories evaluated, and therefore preparation of an EIS is not warranted.

LO002-5

Comment:

Overly Narrow Purpose and Need Statement

The project's purpose and need is defined too narrowly. The document frames the proposed action primarily as accommodating Signature Aviation's projected business growth, centered on attracting larger aircraft and additional apron capacity. While these may represent legitimate business objectives, they do not necessarily establish that further depletion of wetlands serves public interest.

Response:

The Purpose and Need for the Proposed Action was developed in accordance with NEPA and FAA Orders 1050.1G and 5050.4B and reflects the operational objectives of the Proposed Action within the context of the FAA's statutory responsibilities, including the approval authority over revisions to portions of an ALP, which is required by the Proposed Action. Signature is the project sponsor and the lessee and operator of the Signature East and Signature South facilities at TEB, as such the Purpose and Need has been informed by the goals of Signature such as the operational objectives for Signature's leaseholds, which serve Signature's based tenants and transient aircraft operations at the Airport. TEB is a public-use, non-primary reliever airport that serves an important role in the National Airspace System by accommodating general aviation activity and relieving congestion at the region's commercial service airports. As discussed in Section 2 of the EA, the Proposed Action is needed to address existing operational deficiencies at the Signature East and Signature South leaseholds that cannot be resolved under existing conditions. These deficiencies include limited aircraft parking, apron congestion, unnecessary ferry flights, and operational inefficiencies that affect the safe and efficient movement of aircraft. In addition, the evolution of the business aviation fleet toward larger aircraft has reduced the efficiency of the existing aircraft parking configuration, further contributing to these operational deficiencies.

As documented in the FAA-approved aviation activity forecast (Appendix A), demand for Signature's facilities is projected to continue to increase regardless of whether the Proposed Action is implemented. Without additional apron and hangar capacity, the identified operational deficiencies would persist and worsen under the No Action Alternative. Accordingly, the Purpose and Need is based on addressing documented operational deficiencies while accommodating existing and forecast demand within Signature's existing leaseholds, not on inducing additional aviation demand or expanding the Airport. See also Topical Response TR-3.

Consistent with NEPA and FAA Orders 1050.1G and 5050.4B, the EA evaluates the environmental consequences of the Proposed Action, the No Action Alternative, and reasonable alternatives, including impacts to wetlands and other environmental resources. As documented in Section 4 of the EA, the Proposed Action was developed to avoid and minimize environmental impacts to the maximum extent practicable while meeting the project's Purpose and Need.

LO002-6

Comment:

Because the purpose and need statement is framed almost exclusively around accommodating Signature Aviation's projected growth, the alternatives analysis largely evaluates different ways to achieve the expansion rather than meaningfully considering alternatives that could avoid or minimize environmental impacts.

Specifically, alternatives involving the accommodation of future growth at other regional facilities or through operational changes appear to have been dismissed because they would not satisfy Signature's specific objectives, rather than because they fail to serve the region. An objective alternatives analysis must evaluate whether forecast growth should occur at Teterboro at all given the airport's escalating climate vulnerability.

Response:

See Response LO002-5 regarding the Purpose and Need for the Proposed Action. Under NEPA and FAA guidance, the Purpose and Need define the framework for identifying and evaluating reasonable alternatives; an alternative that does not satisfy the Purpose and Need does not get carried forward for detailed analysis. Consistent with FAA Orders 1050.1G and 5050.4B, Section 3 of the EA identifies the range of reasonable alternatives and describes the screening process used to determine which alternatives satisfy the project's Purpose and Need and are practicable to construct and operate. The alternatives evaluated include the No Action Alternative; the use of other airports; the use of other modes of transportation; the use, reconfiguration, or expansion of other Signature facilities; development of other sites at TEB; and multiple alternative site configurations. Additional information regarding the alternatives analysis is provided in Appendix D.

The EA also evaluated alternatives that would avoid or minimize impacts on wetlands to the maximum extent practicable. The No Action Alternative, Use of Other Airports (Alternative 2), and Use of Other Modes of Transportation (Alternative 3) would avoid direct impacts to wetlands but would not satisfy the Purpose and Need for the reasons described in Sections 3.3.1 through 3.3.3 and Appendix D. Similarly, on-Airport alternatives, including the Use, Reconfiguration, or Expansion of Signature West (Alternative 4), alternative configurations at Signature East (Alternative 5) and Signature South (Alternative 6), and Development of Other Sites at TEB (Alternative 7), were evaluated to determine whether they could satisfy the Purpose and Need while avoiding or minimizing environmental impacts. Alternatives 5 and 6 were carried forward for detailed environmental analysis because they satisfied the screening criteria and were determined to be practicable to construct and operate, whereas Alternative 7 was dismissed because it was not practicable.

As described in Sections 3.3.5 and 3.3.6 of the EA and Appendix K, multiple configurations for the Signature East and Signature South sites were evaluated to avoid and minimize wetland impacts to the maximum extent practicable. The layouts and sizes of the proposed aprons, hangars, terminal facilities, and vehicle parking areas were developed in accordance with FAA AC 150/5300-13B and ACRP Report 113 based on the forecast number and types of aircraft expected to use Signature's facilities. The preferred configurations represent the smallest practicable development footprints that satisfy the Purpose and Need while minimizing impacts to wetlands relative to the other reasonable development alternatives evaluated. With respect to the commenter’s concern regarding climate vulnerability, the EA evaluates the potential effects of the Proposed Action on floodplains and flood risk (Section 4.8), and water resources (Section 4.8). See also Topical Responses TR-11 and TR-14.

LO002-7

Comment:

Failure to Account for Induced Demand

Similarly, the Draft EA also assumes that expanding Signature’s facilities will merely accommodate forecasted demand but fails to acknowledge that it will also influence future aviation activity. Expanded capacity is likely to induce additional demand by making Teterboro more attractive to existing and prospective operators. While induced demand is frequently discussed in the context of highway expansions, the same principle should be considered when increasing the capacity of other transportation facilities. The EA must fully evaluate whether the proposed expansion would generate additional operations, and whether the associated environmental consequences have been adequately considered.

Response:

The Proposed Action is not anticipated to induce additional aviation demand or increase aircraft operations. Rather, the FAA-approved aviation activity forecast (Appendix A) projects future aircraft operations at TEB independent of the Proposed Action based on historical activity, socioeconomic conditions, and other accepted forecasting factors. As documented in Section 1.2.2 and Appendix A of the EA, demand for Signature Flight Support's (Signature)

facilities is projected to continue to increase regardless of whether the Proposed Action is implemented. TEB already experiences consistently high demand because of its role as the region's primary airport for non-commercial aviation activity and its proximity to New York City. The additional aircraft parking provided by the Proposed Action is intended to accommodate this forecast demand by addressing existing operational deficiencies and is not expected to generate demand beyond that identified in the FAA-approved forecast.

The forecast also projects a continued shift toward larger business aircraft, increasing the apron and hangar space needed to accommodate the same level of aviation activity. Without the Proposed Action, these trends would exacerbate existing operational deficiencies, including apron congestion, aircraft repositioning, unnecessary ferry flights, and other operational inefficiencies at the Signature East and Signature South leaseholds.

As described in Section 2.3 of the EA, the Proposed Action consists of the redevelopment of Signature's existing leaseholds and would not expand Airport property, add runways or taxiways, or otherwise increase the Airport's operational capacity. As documented in Section 4.3.3.1 of the EA, the Proposed Action would not increase aircraft operations compared to the No Action Alternative. Instead, by reducing unnecessary ferry flights, the Proposed Action is projected to result in approximately 2.6 percent fewer total Airport operations and 3.4 percent fewer Signature operations than the No Action Alternative.

Consistent with FAA Order 1050.1G, the EA evaluated the reasonably foreseeable environmental effects of the Proposed Action using the FAA-approved aviation activity forecast. Based on these analyses, the EA concludes that the Proposed Action would not result in significant environmental impacts.

LO002-8

Comment:

Inadequate Scope of Cumulative Impacts

Finally, RPA is concerned that the EA limits its cumulative impact review to Port Authority-initiated projects on airport property within an arbitrary five-year window. This narrow scope excludes reasonably foreseeable development and incremental wetland losses in the broader watershed. This project directly contributes to cumulative hydrological and ecological consequences that cannot be properly assessed by examining airport property in isolation.

NEPA regulations require that cumulative impact analyses consider the combined effect of past, present, and reasonably foreseeable future actions by any person, federal, or non-federal entity. The EA's limited scope does not satisfy that standard, and an EIS is necessary to provide a genuine cumulative analysis.

Response:

Signature and the Port Authority prepared the EA in accordance with Section 102 of NEPA,[25] DOT Order 5610.1D, and FAA Orders 1050.1G and 5050.4B. In response to CEQ's memorandum issued on February 19, 2025,[26] federal agencies revised or established new NEPA implementing procedures. The CEQ memorandum directs federal agencies to evaluate the reasonably foreseeable effects of a proposed action consistent with Section 102 of NEPA, which does not use the term cumulative effects but instead requires consideration of all reasonably foreseeable effects, regardless of whether they could be characterized as cumulative. CEQ finalized the rescission of its

[25] National Environmental Policy Act, 42 U.S.C. § 4331 (1969).

[26] Executive Office of the President, Council on Environmental Quality, Memorandum for Heads of Federal Departments and Agencies, I*mplementation of the National Environmental Policy Act*, February 19, 2025.

regulations on January 8, 2026. Consistent with this direction, FAA Order 1050.1G does not require a separate cumulative effects analysis to satisfy NEPA.

As documented in Section 4 of the EA, Signature and the Port Authority considered the reasonably foreseeable environmental effects of the Proposed Action, the reasonable alternatives, and the No Action Alternative, including the effects of projects proposed by the Port Authority at TEB that are reasonably expected to occur within the next five years. The EA does not evaluate projects outside TEB property or projects anticipated to occur beyond this timeframe because any environmental effects associated with those projects do not have a reasonably close causal relationship to the Proposed Action and would therefore be speculative. Likewise, the EA does not include projects proposed or initiated by parties other than the Port Authority or Signature because implementation of those projects is uncertain and dependent on future economic and other factors. The commenter's reference to incremental wetland losses in the broader Meadowlands watershed pertains to environmental trends and actions by other parties that lack a reasonably close causal relationship to the Proposed Action and are therefore outside the scope of the EA's analysis of reasonably foreseeable effects.

The Port Authority identified four reasonably foreseeable future projects at TEB that are expected to occur within the next five years: (1) Rehabilitation of Various Taxiways and the Hangar 1 Ramp; (2) Installation of an Aircraft Run-up Pad; (3) Airport Perimeter Fencing; and (4) Runway 6 Departure EMAS. Additional information on these projects is provided in Appendix N (Footnotes 38 through 41). The potential environmental effects of these future projects were considered in the evaluation of each environmental resource presented in Section 4 of the EA.

LO002-9

Comment:

Conclusion

The limited public benefits from an expanded Teterboro Airport are greatly outweighed by the long-term environmental and resilience costs of removing critical wetlands and increasing flood risk within the Meadowlands. This project involves permanent wetland impacts, expansion of impervious surfaces, long-term implications for flood resilience, and severe deficiencies in cumulative impact analysis. Collectively, these issues raise substantial questions that warrant the rigorous analysis, robust alternatives evaluation, and public review provided exclusively by an EIS.

Response:

See Responses LO002-2 through LO002-4, LO002-6, and LO002-8. The Proposed Action is located entirely within existing Airport property and is intended to accommodate existing and forecast demand for aircraft parking. As documented in Section 4 and Appendix N of the EA, the environmental analysis considered the reasonably foreseeable environmental effects on floodplains, wetlands, water resources, air quality, noise, and other applicable environmental resource categories, including the implementation of applicable mitigation measures. Based on these analyses, the EA concluded that the Proposed Action would not result in significant environmental impacts. Under NEPA and FAA orders, preparation of an EIS is required when a proposed action may result in significant environmental impacts. The EA's analyses did not identify significant environmental impacts resulting from the Proposed Action.

LO002-10

Comment:

For these reasons, Regional Plan Association respectfully requests that the FAA decline to issue a FONSI, prepare a full Environmental Impact Statement, and thoroughly evaluate alternatives that avoid additional wetland impacts while protecting the long-term resilience of the Meadowlands.

Thank you for the opportunity to comment.

Sincerely,

Zoe Baldwin

Response:

As described in the responses above, the EA evaluates the potential environmental effects of the Proposed Action in accordance with NEPA, FAA Orders 1050.1G and 5050.4B, and other applicable federal, state, and local requirements. The information presented in the EA is intended to inform the FAA's decision-making process regarding the Proposed Action.

LO004 HACKENSACK RIVERKEEPER
SHEEHAN, BILL

LO004-1

Comment:

On behalf of the Hackensack Riverkeeper, the surrounding communities, residents, and stakeholders of the Hackensack River watershed, these comments are formally submitted in steadfast opposition to the proposed expansion of the Signature Aviation Fixed-Base Operator (FBO) facility at Teterboro Airport.

Response:

See Topical Response TR-17.

LO004-2

Comment:

The proposed project threatens to dredge, fill, and permanently destroy critical wetlands of exceptional biological importance.

Response:

Please see responses in TR-12 regarding wetlands.

LO004-3

Comment:

As detailed below, this expansion fails to meet the stringent public interest, safety, and environmental criteria required for regulatory approval. Most notably, this curent application represents a fifth systematic attempt to advance a structurally identical expansion footprint that has been repeatedly questioned, deferred, or rejected by regulatory scrutiny. The applicant has presented no new data, altered environmental conditions, or updated regional infrastructure needs that would justify overturning years of consistent regulatory consensus.

Response:

The EA was prepared in accordance with NEPA, DOT Order 5610.1D, FAA Order 1050.1G, FAA Order 5050.4B, and other applicable federal requirements. As documented in Section 1.1 of the EA, the FAA coordinated preparation of the EA with the appropriate federal, state, and local agencies, including the USFWS, USEPA, USACE, NJDEP, and NJSEA.

The Proposed Action has been evaluated based on the current project, the current environmental setting, and current FAA Order 1050.1G, and the information contained in the EA. The FAA's review under NEPA is based on the environmental consequences of the Proposed Action and reasonable alternatives and does not rely on prior proposals or previous regulatory reviews to determine the outcome of the current environmental review. The EA provides the information necessary for the FAA to evaluate the environmental effects of the current Proposed Action and determine whether it would result in significant environmental impacts in accordance with NEPA and other applicable federal requirements.

LO004-4

Comment:

This project lacks a demonstrated public necessity, introduces severe regional flooding liabilities, ignores explicit federal wildlife conservation priorities, and directly diverges from the statutory public use intentions governing publicly managed aviation infrastructure. Furthermore, as highlighted by state lawmakers and regional advocates, Teterboro Airport is already facing severe scruinty for operating beyond its intended scope; approving this infrastructure expansion would lock in illegal, de facto commercial operations at the expense of northern New Jersey communities.[27]

Response:

Please see Responses LO004-5, LO004-6, LO004-7, and LO004-8. Under 49 U.S.C. § 47107(a) and the associated FAA Airport Sponsor Grant Assurances, the Port Authority, as the airport sponsor, is responsible for operating and maintaining TEB as a public-use airport in accordance with the approved ALP and ACM. As a public-use airport, TEB is available to aeronautical users on reasonable and nondiscriminatory terms. The FAA classifies TEB as a national, non-primary reliever airport that serves general aviation activity and helps relieve congestion at the region's commercial service airports. TEB is not certificated to provide scheduled commercial airline service, and the Proposed Action would not change the Airport's role or FAA classification.

To support general aviation activity at TEB, the Port Authority leases Airport property to three FBOs: Atlantic Aviation, Jet Aviation, and Signature. These FBOs are privately owned and operated businesses that provide aeronautical services under lease agreements with the Port Authority. The Proposed Action is limited to the redevelopment of Signature's existing Signature East and Signature South lease areas and does not include improvements outside of Signature's existing leaseholds or elsewhere on Airport property.

As described in Section 2 of the EA, the Proposed Action does not expand Airport property, add runways or taxiways, increase the Airport's operational capacity, or authorize additional aircraft operations. Rather, it addresses documented operational deficiencies associated with limited aircraft parking, apron congestion, unnecessary ferry flights, and other operational inefficiencies affecting the safe and efficient movement of aircraft. The Proposed Action accommodates existing and forecast demand within Signature's existing lease areas and would not convert TEB into a commercial service airport or authorize scheduled commercial airline operations.

The FAA has exclusive authority over the use of navigable airspace and aircraft operations pursuant to 49 U.S.C. § 40103(b). The EA was prepared in accordance with NEPA, FAA Order 1050.1G, FAA Order 5050.4B, and other applicable federal requirements and evaluates the environmental consequences of the Proposed Action, the No

[27] Snyder, J. (2026, May 25). *Is Anybody Listening? 39th District lawmaker presses federal officials on Teterboro Airport rules, routes*. Pascack Press & Northern Valley Press. https://thepressgroup.net/is-anybody-listening-39th-district-lawmaker-presses-federalofficials-on-teterboro-airport-rules-routes/

Action Alternative, and reasonable alternatives. As documented in Section 4 of the EA, the Proposed Action would not result in significant environmental impacts.

LO004-5

Comment:

A Pattern of Administrative Attrition and Failure to Meet the LEDPA Mandate

This current proposal does not exist in a regulatory vaccum; it is the fifth iteration of a heavily contested effort to expand private corporate aviation infrastructure into Teterboro's sensitive perimeter wetlands.

Under Section 404(b)(1) Guidelines of the Clean Water Act, the U.S. Army Corps of Engineers (USACE) is legally prohibited from issuing a permit if there is a Least Environmentally Damaging Practicable Alternative (LEDPA) that achieves the basic project purpose. Here, the proposed project fails to prove that the alternative to reconfigure existing facilities is insufficient for the need expressed and the expansion proposed would functionally violate 40 C.F.R. § 230.10(a).

The applicant's persistent choice to submit the same footprint for a fifth consecutive time without adjusting layout, optimizing Signature's existing (and massive) Teterboro footprint, or utilizing alternative regional FBO footprints, fails to overcome the legal presumption that a less damaging alternative exists. Under 40 C.F.R. § 230.12(a)(3)(iv), the regulatory agency is required to deny a permit if the applicant fails to provide sufficient data to prove compliance with these alternative analysis guidelines.

Response:

In accordance with FAA Orders 1050.1G and 5050.4B, Section 3 of the EA outlines the alternatives to the Proposed Action and describes the screening process used to evaluate which alternatives would best meet the Purpose and Need of the Proposed Action. The alternatives identified for evaluation include, but are not limited to, the No Action Alternative, the use of other modes of transportation, the use of other airports, the use of other FBO facilities, different facility layouts, and development at other locations on the Airport. Additional information regarding the alternatives analysis is provided in Appendix D of the EA.

Consistent with Section 404(b)(1) Guidelines of CWA, EO 11990, and DOT Order 5660.1A, the EA also includes a separate alternatives analysis to identify practicable alternatives that would avoid and minimize impacts to wetlands. As documented in Appendix K, this analysis was prepared to support the Section 404 permitting process and evaluates alternatives consistent with the requirements of the Section 404(b)(1) Guidelines.

Signature evaluated multiple non-development alternatives, including the No Action Alternative (Section 3.3.1), Use of Other Airports (Alternative 2; Section 3.3.2), and Use of Other Modes of Transportation (Alternative 3; Section 3.3.3). Although these alternatives would avoid direct impacts on wetlands, they would not satisfy the Purpose and Need for the Proposed Action for the reasons described in the EA and therefore were not carried forward for detailed analysis. These alternatives, which include the use of other FBO facilities at airports in the region, are discussed further in Sections D-3.2 and D-3.3 of Appendix D.

Signature also evaluated on-Airport alternatives, including the Use, Reconfiguration, or Expansion of Signature West (Alternative 4), multiple configurations for Signature East (Alternative 5) and Signature South (Alternative 6), and Development of Other Sites at TEB (Alternative 7). Alternatives 5 and 6 were carried forward because they satisfy the Purpose and Need and were determined to be practicable to construct and operate, while Alternative 4 was dismissed because it does not meet the Purpose and Need of the Proposed Action (see Section 3.4.4 of the EA), and Alternative 7 was dismissed because it is not practicable to construct (see Section 3.3.7 of the EA).

Signature also analyzed the reconfiguration of the existing Signature East and Signature South sites without expansion (Alternative 5 Configuration 1 and Alternative 6 Configuration 1, respectively). As documented in Tables 3-6 through 3-9 of the EA, reconfiguration at either site without expansion would not increase overall facilities area or aircraft parking space towards the 2044 facilities requirements. Therefore, neither reconfiguration-only option would meet the Purpose and Need of the Proposed Action, and both were eliminated from further consideration. The EA evaluated four additional expansion configurations for Signature East (Configurations 2 through 5) and six additional expansion configurations for Signature South (Configurations 2 through 7), each developed to avoid and minimize wetland impacts to the maximum extent practicable (see Sections 3.3.5, 3.3.6, and Appendix K). The proposed apron, hangar, terminal, and vehicle parking layouts were developed in accordance with FAA AC 150/5300-13B and ACRP Report 113 based on the forecast number and types of aircraft expected to use the Signature facilities (see Appendix A). Since publication of the Draft EA, the Proposed Action has been further refined to reduce permanent wetland impacts from 11.0 acres to 10.9 acres. As summarized in Tables 3-2 and 3-3 of the EA, Configuration 5 at Signature East and Configuration 6 at Signature South represent the smallest practicable development footprints among the reasonable alternatives that satisfy the Purpose and Need while minimizing impacts to wetlands, including higher-quality palustrine forested and scrub-shrub wetlands.

As the commenter notes, Signature and the Port Authority have been assessing these improvements for a number of years. Signature originally proposed Configuration 2 at Signature East and Configuration 2 at Signature South, which would result in greater wetland impacts than the current Proposed Action (4.45 acres and 11.38 acres, respectively, for a total of 15.83 acres of total wetland impacts). Through the permitting and NEPA process, in coordination with the regulatory agencies, Signature has reduced proposed impacts to wetlands from 15.8 acres to 10.9 acres, a reduction of 4.9 acres.

USACE is the federal agency responsible for determining compliance with the CWA Section 404(b)(1) Guidelines, including identification of the Least Environmentally Damaging Practicable Alternative (LEDPA), as part of its permit review. The EA and Appendix K provide data and analysis that may support the Section 404 permit process with the USACE, including the evaluation of practicable alternatives to avoid and minimize impacts to waters of the United States consistent with the requirements of 40 C.F.R. § 230.10(a). However, the EA and Appendix K have been prepared to satisfy FAA's obligations under NEPA and do not constitute USACE's determination on the Section 404 permit. USACE may adopt the EA, as appropriate, to satisfy its NEPA obligations associated with issuance of a Section 404 permit.

LO004-6

Comment:

Circumvention of Federal Law and the Public Use Airport Mandate

Teterboro Airport operates under the regulatory umbrella of the Port Authority of New York and New Jersey and receives federal oversight on the premise that it functions as a public-use, general aviation airport.

Because Teterboro Airport accepts federal Airport Improvement Program (AIP) funds, it is bound by strict federal contracts. Grant Assurance No. 22 ("Economic Nondiscrimination") requires the airport sponsor to make the facility available for "public use on reasonable terms and without unjust discrimination."[28] Creating additional space for Signature, at the cost of irreplaceable wetlands, is essentially undermining this assurance by prioritizing private corporations over public use.

Slicing away protective natural wetlands to build exclusive corporate infrastructure for a private entity like Signature Aviation represents a clear perversion of the Public-Use Doctrine. As documented by NJ 39th District Assemblyman

[28] 49 U.S.C. § 47107(a)(1)

Robert Auth, there is profound legislative alarm that Teterboro is actively circumventing federal restrictions designed to keep it from functioning as a commercial passenger hub.[29]

Response:

See Responses LO004-2 through LO004-5. Under 49 U.S.C. § 47107(a) and the associated FAA Airport Sponsor Grant Assurances, the Port Authority, as the airport sponsor, is responsible for operating and maintaining TEB as a public-use airport in accordance with the approved ALP and ACM. As a public-use airport, TEB is available to aeronautical users on reasonable and nondiscriminatory terms. The FAA classifies TEB as a national, non-primary reliever airport that serves general aviation activity and helps relieve congestion at the region's commercial service airports. TEB is not certificated to provide scheduled commercial airline service, and the Proposed Action would not change the Airport's role or FAA classification.

To support general aviation activity at TEB, the Port Authority leases Airport property to three FBOs: Atlantic Aviation, Jet Aviation, and Signature. These FBOs are privately owned and operated businesses that provide aeronautical services under lease agreements with the Port Authority. The Proposed Action is limited to the redevelopment of Signature's existing Signature East and Signature South lease areas and does not include improvements outside of Signature's existing leaseholds or elsewhere on Airport property.

Further, the EA was prepared in accordance with NEPA, DOT Order 5610.1D, FAA Order 1050.1G, FAA Order 5050.4B, and other applicable federal requirements. As documented in Section 1.1 of the EA, the FAA coordinated preparation of the EA with the appropriate federal, state, and local agencies, including the USFWS, USEPA, USACE, NJDEP, and NJSEA.

An analysis of alternatives to avoid, minimize, and compensate for impacts to wetlands was completed in accordance with the CWA Section 404(b)(1) Guidelines, EO 11990, and U.S. DOT Order 5660.1A. As documented in Appendix K, no practicable avoidance alternative was identified that would satisfy the project's Purpose and Need. However, the preferred configurations for the Signature East and Signature South sites minimize wetland impacts relative to the other reasonable development alternatives evaluated (see Table 4-8). Since publication of the Draft EA, the Proposed Action has been further refined to reduce permanent wetland impacts from 11.0 acres to 10.9 acres. Additional information regarding wetland avoidance and minimization is provided in Appendix K.

See Topical Responses TR-3 and TR-4 with regard to the aviation activity forecast and purpose and need for the Proposed Action.

LO004-7

Comment:

Expanding private FBO capacity to facilitate pseudo-commercial, public-charter loophole booking prioritizes private corporate equity over the fundamental safety and public utility guaranteed to the taxpaying public.

Response:

As noted in Responses LO004-4 and LO004-6, under 49 U.S.C. § 47107(a) and the associated FAA Airport Sponsor Grant Assurances, the Port Authority, as the airport sponsor, is responsible for operating and maintaining TEB as a public-use airport in accordance with the approved ALP and ACM. As a public-use airport, TEB is available to

[29] Snyder, J. (2026, May 25). *Is Anybody Listening? 39th District lawmaker presses federal officials on Teterboro Airport rules, routes*. Pascack Press & Northern Valley Press. https://thepressgroup.net/is-anybody-listening-39th-district-lawmaker-presses-federalofficials-on-teterboro-airport-rules-routes/

aeronautical users on reasonable and nondiscriminatory terms. The FAA classifies TEB as a national, non-primary reliever airport that serves general aviation activity and helps relieve congestion at the region's commercial service airports. TEB is not certificated to provide scheduled commercial airline service, and the Proposed Action would not change the Airport's role or FAA classification.

To support general aviation activity at TEB, the Port Authority leases Airport property to three FBOs: Atlantic Aviation, Jet Aviation, and Signature. These FBOs are privately owned and operated businesses that provide aeronautical services under lease agreements with the Port Authority. The proposed layouts and sizes of the apron, hangar, terminal, and parking facilities analyzed for each configuration were developed in accordance with FAA AC 150/5300-13B and ACRP Report 113. The layouts were based on the forecast number and types of aircraft expected to use the Signature facilities. The proposed apron and hangar areas reflect the minimum area necessary to safely maneuver, park, and operate aircraft while satisfying the Purpose and Need for the Proposed Action. The Proposed Action is limited to the redevelopment of Signature's existing Signature East and Signature South lease areas and does not include improvements outside of Signature's existing leaseholds or elsewhere on Airport property. See Topical Response TR-6 regarding alternatives to avoid impacts.

LO004-8

Comment:

Absolute Lack of Public Need under State Law (N.J.A.C. 7:7A)
The applicant has continuously failed to establish a compelling operational need that justifies the permanent degradation of a scarce natural resource. Teterboro Airport already hosts multiple robust FBO complexes, including extensive facilities operated by Atlantic Aviation, Jet Aviation, and Signature Aviation itself.

Response:

A description of the Purpose and Need for the Proposed Action was developed in accordance with NEPA and FAA Orders 1050.1G and 5050.4B. As described in Section 2 of the EA, the Purpose and Need is based on addressing documented operational deficiencies at the existing Signature East and Signature South leaseholds and is not based on accommodating business growth. Demand for Signature’s facilities currently exceeds available aircraft parking capacity, resulting in apron congestion, increased aircraft idling, unnecessary ferry flights, and operational inefficiencies that affect the safe and efficient movement of aircraft. In addition, the evolution of the business aviation fleet toward larger aircraft has reduced the efficiency of the existing aircraft parking configuration, further contributing to these operational deficiencies.

Although other FBOs operate at TEB, the Proposed Action is limited to development at Signature's existing leaseholds. The operational conditions, facility requirements, and leaseholds of other FBOs are outside the scope of the Proposed Action. As documented in the FAA-approved aviation activity forecast (Appendix A), demand for Signature's facilities is projected to continue to increase regardless of whether the Proposed Action is implemented. Without additional apron and hangar capacity, the identified operational deficiencies would persist and worsen under the No Action Alternative.

Consistent with NEPA and FAA Orders 1050.1G and 5050.4B, the EA evaluated the environmental consequences of the Proposed Action, the No Action Alternative, and reasonable alternatives. The Proposed Action was developed to avoid and minimize environmental impacts to the maximum extent practicable while meeting the project's Purpose and Need. As documented in Section 4 of the EA, the analyses conclude that the Proposed Action would not result in significant environmental impacts. Please also see Topical Response TR-4.

LO004-9

Comment:

Under the New Jersey Freshwater Wetlands Protection Act Rules, an applicant must establish a "rebuttable presumption" of public need to disturb wetlands of biological importance. Because no new, verifiable demand data has materialized since the previous four submittals, the applicant has entirely failed to meet this state-level legal standard.

Response:

The EA presents updated aviation demand data based on actual 2024 operations data and the FAA 2024 Terminal Area Forecast. As documented in Section 1.2.2 and Appendix A of the EA, total Signature operations are forecast to increase from approximately 127,200 in 2024 to 197,600 in 2044, representing a compound annual growth rate of 2.2 percent. The aviation activity forecast also reflects a continued shift in fleet mix toward larger aircraft, including Airplane Design Group III aircraft, which reduces parking efficiency and compounds existing facility deficits. Appendix B presents the analysis of facility requirements for Signature East and Signature South based on these forecasts. As further documented in Section 2.2 of the EA, existing demand for Signature facilities already exceeds capacity, resulting in apron congestion, operational inefficiencies, and safety concerns.

Specific to permitting, NJDEP has jurisdiction and is responsible for issuing approvals related to the Flood Hazard Area Control Act at N.J.A.C. 7:13, Stormwater Management Rules at N.J.A.C. 7:8, and the Water Quality Certificate (WQC) under Section 401 of the CWA, while USACE has jurisdiction over Section 404 of the CWA and is responsible for issuing approvals related to wetlands within the Hackensack Meadowlands District. NJDEP does not have jurisdiction over any proposed projects within wetlands in the Hackensack Meadowlands District. Specifically, as per N.J.A.C. 7:7A-2.5, regulated activities in areas under the jurisdiction of the New Jersey Sports and Exposition Authority under N.J.S.A. 13:17-1 et seq., do not require a permit under this chapter. However, a Meadowlands District WQC is required and issued by NJDEP under Section 401 of the CWA to ensure that a project that requires federal permitting is compliant with New Jersey's water quality rules. The NJDEP issued the WQC for the Proposed Action on July 16, 2026 (see Appendix R). The information presented in the EA, including the Purpose and Need documented in Section 2, the aviation demand analysis in Appendix A, the facility requirements analysis in Appendix B, and the alternatives analysis in Appendix K, provides the supporting documentation for that review.

Please also see Topical Response TR-4 and Responses LO004-3 and LO004-4 for additional information regarding the Purpose and Need for the Proposed Action.

LO004-10

Comment:

Exacerbation of Severe Regional Flooding Hazards

The Teterboro Airport complex sits directly at the headwaters of the Berrys Creek subwatershed, a critical tidal tributary of the Hackensack River system.[30] The surrounding Hackensack Meadowlands have suffered extensive historic loss of marshland due to urbanization, severely compromising the natural hydrologic capacity of the basin.[31]

Wetlands are indispensable natural sponges that absorb stormwater and buffer communities from severe tidal and rain-driven surges. Replacing permeable, biologically active wetlands with impervious asphalt will drastically

[30] Wright, V. A. (2005). *Berrys Creek: A Glance Backward and a Look Forward*. University of Massachusetts Amherst. https://scholarworks.umass.edu/bitstreams/29258353-050c-4e9baa9a-5293fd56b900/download

[31] Kiviat, E., & MacDonald, K. (2002). *Hackensack Meadowlands, New Jersey, Biodiversity: A Review and Synthesis*. Hudsonia Ltd. / U.S. Environmental Protection Agency. https://www.epa.gov/sites/default/files/2017-05/documents/kiviat_and_mcdonald_2002_hackensack_meadowlands_biodiversity_review. pdf

accelerate stormwater runoff into an already heavily stressed, flood-prone basin.[32] This directly threatens the safety, property, and economic well-being of the surrounding lowlying municipalities in Bergen and Hudson counties. This is particularly relevant to the communities surrounding Teterboro Airport that suffered severe storm surge flooding during Superstorm Sandy.

Response:

Signature evaluated the Proposed Action's potential impacts to surface waters, stormwater management, and floodplains in accordance with FAA Order 1050.1G, EO 11988, U.S. DOT Order 5650.2, and the N.J.A.C. 7:8. NJDEP, which has regulatory authority over these resources, was consulted throughout preparation of the EA.

Although the Proposed Action would increase impervious surface within the project area, it was designed to comply with New Jersey's stormwater management requirements for runoff quantity, runoff quality, and groundwater recharge, as applicable. As documented in the Engineering Reports included in Appendix M of the EA, hydrologic and hydraulic analyses were completed to evaluate the increase in stormwater runoff associated with the Proposed Action. These analyses demonstrate that the proposed stormwater management systems would control runoff in accordance with N.J.A.C. 7:8 and would not increase downstream flooding or adversely affect surrounding communities. While the conversion of wetlands to developed surfaces within the project area would reduce natural flood attenuation at those locations, the Proposed Action includes engineered stormwater management features specifically designed to offset this loss, including underground detention systems and pervious pavement, that were specifically designed to manage post-development runoff and offset the loss of on-site flood attenuation. Accordingly, the Proposed Action will not increase downstream flooding impacts as a result of the unavoidable wetland impacts.

Because the Airport is located within the FEMA-designated 100-year floodplain of the Hackensack River, the Proposed Action also requires a Flood Hazard Area Verification and Flood Hazard Area Individual Permit from NJDEP. As such, NJDEP issued the Flood Hazard Area Verification and Flood Hazard Area Individual Permit on July 16, 2026 (see Appendix R). Consistent with EO 11988 and DOT Order 5650.2, practicable alternatives that would avoid construction within the floodplain were evaluated; however, no practicable avoidance alternative was identified that would satisfy the project's Purpose and Need. As documented in Section 4.8 of the EA, the Proposed Action would not result in a significant floodplain encroachment because it would not increase flood hazards, adversely affect the natural and beneficial values of the floodplain, or result in substantial flood-related damage. The EA's floodplain and stormwater analyses were conducted in consideration of the existing flood vulnerability of the surrounding area, including the documented impacts of Superstorm Sandy on communities in Bergen and Hudson counties. Additionally, as described in Section 4.8.3.3 of the EA, unavoidable wetland impacts would be compensated through the purchase of mitigation credits from approved mitigation banks or through compensatory mitigation at a site within the same watershed, thereby preserving wetland functions and values, including flood attenuation capacity, within the Hackensack River watershed. See also Topical Response TR-11.

LO004-11

Comment:

Cumulative Impact and Climate Resiliency Baseline Shifts

[32] Demirbilek, Z. (1992). *Passaic River Basin Flood Protection Project, Storm Surge Analysis*. U.S. Army Engineer Waterways Experiment Station. https://apps.dtic.mil/sti/tr/pdf/ADA257344.pdf

By submitting this expansion as an isolated action five separate times, the applicant conveniently sidesteps the broader environmental reality which exists as climate change continually impacts local weather, storm intensity, and storm frequency.

Under federal (NEPA) and state regulatory frameworks, the applicant must evaluate this project in tandem with the total historic and ongoing loss of wetlands across the Hackensack River basin. Slicing away small fractions over time results in catastrophic cumulative drainage failure. The hydrological data anchoring the applicant's historical submittals fails to reflect the reality of escalating severe weather patterns. With multi-inch rain events becoming standard regional occurrences, the relative flood-storage value of every remaining square foot of wetland has amplified. This application cannot be adequately evaluated without the most recent, accurate data reflecting how the proposed expansion would impact local hydrology and community impact.

Response:

Please see Response LO004-10. Signature and the Port Authority prepared the EA in accordance with Section 102 of NEPA,[33] DOT Order 5610.1D, and FAA Orders 1050.1G and 5050.4B. In response to the CEQ memorandum issued on February 19, 2025,[34] federal agencies revised or established new NEPA implementing procedures. The CEQ memorandum directs federal agencies to evaluate the reasonably foreseeable effects of a proposed action consistent with Section 102 of NEPA, which does not use the term cumulative effects but instead requires consideration of all reasonably foreseeable effects, regardless of whether they could be characterized as cumulative. CEQ finalized the rescission of its regulations on January 8, 2026. Consistent with this direction, FAA Order 1050.1G does not require a separate cumulative effects analysis to satisfy NEPA.

As documented in Section 4 of the EA, Signature and the Port Authority considered the reasonably foreseeable environmental effects of the Proposed Action, the reasonable alternatives, and the No Action Alternative, including the effects of projects proposed by the Port Authority at TEB that are reasonably expected to occur within the next five years. The EA does not evaluate projects outside TEB property or projects anticipated to occur beyond this timeframe because any environmental effects associated with those projects do not have a reasonably close causal relationship to the Proposed Action and would therefore be speculative. Likewise, the EA does not include projects proposed or initiated by parties other than the Port Authority or Signature because implementation of those projects is uncertain and dependent on future economic and other factors. See also Topical Response TR-11 for additional discussion of floodplain impacts and flood risk and Topical Response TR-14 for environmental justice and climate change considerations.

LO004-12

Comment:

Disregard for U.S. Fish and Wildlife Service (USFWS) and the Fish and Wildlife Coordination Act

The wetlands slated for destruction are contiguous elements of the Hackensack Meadowlands ecosystem, which the USFWS has explicitly designated as a Significant Habitat Complex of the New York Bight Watershed.[35]

[33] National Environmental Policy Act, 42 U.S.C. § 4331 (1969).

[34] Executive Office of the President, Council on Environmental Quality, Memorandum for Heads of Federal Departments and Agencies, *Implementation of the National Environmental Policy Act*, February 19, 2025.

[35] Kiviat, E., & MacDonald, K. (2002). *Hackensack Meadowlands, New Jersey, Biodiversity: A Review and Synthesis*. Hudsonia Ltd. / U.S. Environmental Protection Agency. https://www.epa.gov/sites/default/files/2017-05/documents/kiviat_and_mcdonald_2002_hackensack_meadowlands_biodiversity_review. pdf

The Fish and Wildlife Coordination Act (16 U.S.C. §§ 661-667e) mandates that federal permitting agencies give equal weight and serious consideration to the conservation recommendations of the USFWS to prevent the loss of wildlife resources. Encroaching upon this habitat disrupts critical migratory bird corridors and directly undermines millions of dollars of public investment in regional Superfund remediation and natural resource damage restorations. Moving forward with a fifth attempt despite well-documented federal wildlife opposition bypasses the core conservation intent of 16 U.S.C. § 661.

Response:

Signature assessed the potential effects of the Proposed Action on biological resources in accordance with FAA Order 1050.1G and consistent with the Fish and Wildlife Coordination Act (16 U.S.C. §§ 661-667e). USFWS and NJDEP, the agencies with regulatory authority over biological resources within the project area, were consulted throughout preparation of the EA. As documented in the USFWS coordination letter dated June 27, 2024 (see Appendix H), the USFWS reviewed the Proposed Action and provided conservation recommendations that have been incorporated into the project design. Agency coordination is documented in Appendix H of the EA.

With respect to the commenter's reference to the Hackensack Meadowlands as a Significant Habitat Complex, this designation originates from the 1996 USFWS publication Significant Habitats and Habitat Complexes of the New York Bight Watershed, which identified 35 regionally significant habitat complexes across eastern New Jersey, the Hudson River, and southern Long Island. The Hackensack Meadowlands is one of those 35 complexes. This publication is an informational and planning resource intended to guide land use decisions and habitat protection efforts; it does not establish additional regulatory requirements beyond those already addressed in the EA. The specific wetlands within the Signature East and Signature South project areas are located within a highly developed airport environment and are predominantly composed of common reed (*Phragmites australis*), a widespread non-native invasive species. These wetlands have been influenced by decades of airport operations and are actively managed in accordance with the FAA-approved WHMP. Section 4.8 of the EA evaluates the existing functions and values of the affected wetlands; compensatory mitigation for unavoidable impacts would be provided through approved mitigation banks within the same watershed, as described in Section 4.8.3.3.

The EA also evaluated potential impacts to federally listed species, migratory birds, wetlands, and other biological resources. As documented in Section 4.4 of the EA, the USFWS determined that no designated critical habitat occurs within the project area. The USFWS further concluded that the Proposed Action is not likely to jeopardize the continued existence of the tricolored bat, and that Section 7(a)(4) coordination is not required. Although suitable habitat for the monarch butterfly was not identified within the project area, Signature and the Port Authority have committed to implementing the conservation measures recommended by the USFWS for both the tricolored bat and monarch butterfly. These measures are identified in Section 4.4.3.3 of the EA.

The EA also evaluated potential effects on migratory birds protected under the MBTA. The project area is located within a highly developed airport environment that is actively managed under the FAA-approved WHMP, which minimizes wildlife attractants while maintaining safe aircraft operations. To further avoid impacts to migratory birds, the Proposed Action incorporates the conservation measures recommended by the USFWS, including seasonal restrictions on vegetation clearing and pre-construction nest surveys, as described in Section 4.4.3.3 of the EA.

Accordingly, the EA was prepared in consultation with the USFWS consistent with the requirements of the Fish and Wildlife Coordination Act and considers the agency's conservation recommendations regarding biological resources and wildlife conservation. As documented in Section 4.4 of the EA, implementation of the Proposed Action, together with the identified conservation measures, would not result in significant impacts to biological resources. Furthermore, in a letter dated July 2, 2026, the USFWS confirmed that it has completed its review of the EA documentation, participated as a cooperating agency throughout the NEPA process, and has no further comments on the Proposed Action (see Response AF001).

With respect to the commenter's reference to regional Superfund remediation and natural resource damage restoration efforts, potential effects related to hazardous materials, solid waste, and pollution prevention are evaluated in Section 4.6 of the EA.

LO004-13

Comment:

Disproportionate Private Gain vs. Public Risk and Community Burden
Teterboro Airport relies heavily on federal funding and public management structures to operate, yet the negative externalized impacts of its operations fall entirely on surrounding residents.

As local advocates have documented, nearby suburban neighborhoods are already subject to highly concentrated, repetitive flight paths that act as a constant source of disruption.[36] Airport operators continuously choose routing paths based on passenger comfort rather than using highway approaches that would minimize residential disturbance.[37]

Response:

Please see Responses LO004-1, LO004-3, and LO004-6.

As identified in Section 2.2.3 of the EA, the lack of adequate aircraft parking on aprons and within hangars at TEB has resulted in unnecessary ferry flights, which generate two additional aircraft operations for each repositioning event. These ferry flights contribute to aircraft noise, air emissions, airspace congestion, and operational inefficiencies within the New York and New Jersey metropolitan area. As demand for Signature's facilities continues to increase, these conditions are expected to worsen under the No Action Alternative.

The Proposed Action is intended to address these existing operational deficiencies by providing additional aircraft parking and hangar capacity within Signature's existing leaseholds. As documented in the FAA-approved aviation activity forecast (Appendix A), demand for Signature's facilities is projected to continue to increase regardless of whether the Proposed Action is implemented. By reducing unnecessary ferry flights, the Proposed Action is projected to result in approximately 2.6 percent fewer total Airport operations and 3.4 percent fewer Signature operations than would occur under the No Action Alternative.

Aircraft flight paths, arrival and departure procedures, and air traffic routing are established and managed by the FAA to ensure the safe and efficient operation of the National Airspace System and are not determined by the Proposed Action. Accordingly, the Proposed Action would not modify existing flight procedures or aircraft routings. As documented in Section 4.7 of the EA, the Proposed Action would not result in significant noise impacts.

The EA was prepared in accordance with NEPA, FAA Order 1050.1G, FAA Order 5050.4B, and other applicable federal requirements. As documented in Section 4 of the EA, the FAA evaluated the environmental consequences of the Proposed Action, the No Action Alternative, and reasonable alternatives across the applicable environmental resource categories. Based on these analyses, the Proposed Action would not result in significant environmental impacts.

[36] Snyder, J. (2026, May 25). *Is Anybody Listening? 39th District lawmaker presses federal officials on Teterboro Airport rules, routes*. Pascack Press & Northern Valley Press. https://thepressgroup.net/is-anybody-listening-39th-district-lawmaker-presses-federalofficials-on-teterboro-airport-rules-routes/

[37] *Id.*

LO004-14

Comment:

Signature Aviation reaps corporate profits, while the taxpaying public and surrounding municipal governments bear the compounding fiscal burdens of increased noise, diminished quality of life, and stormwater infrastructure upgrades required to offset the loss of natural defenses such as naturally occurring wetlands.

Response:

As described in Section 4 of the EA, the environmental consequences of the Proposed Action, the No Action Alternative, and reasonable alternatives were evaluated in accordance with NEPA and FAA Order 1050.1G. The analysis considered the reasonably foreseeable environmental effects of each alternative, including the type, context, intensity, and duration of potential impacts. Consistent with FAA Order 1050.1G, the EA evaluated the applicable environmental impact categories and, as appropriate to the Proposed Action, considered both short- and long-term effects, beneficial and adverse effects, and potential effects on economic conditions and quality of life.

The EA specifically evaluated potential effects related to aircraft noise, stormwater management, wetlands, floodplains, and other environmental resources. As documented in Section 4, the Proposed Action would not result in significant environmental impacts. The Proposed Action also incorporates measures to avoid and minimize impacts to wetlands, comply with applicable New Jersey stormwater management requirements, and compensate for unavoidable wetland impacts through off-site mitigation. Accordingly, the EA does not conclude that implementation of the Proposed Action would result in the significant environmental effects described in the comment.

LO004-15

Comment:

Compounding Environmental Justice (EJ) Burdens (N.J.S.A. 13:1D-157)
The communities surrounding the lower Hackensack River watershed are densely populated urban and suburban areas that already shoulder a disproportionate regional share of legacy industrial pollution, Superfund sites, and localized air quality issues. New Jersey has failed to achieve Clean Air Act attainment standards since the late 1970s and is in a nonattainment zone comprised of the greater Tri-State area. Adding capacity to an already overburdened airport in a nonattainment area would only serve to further degrade air quality for the communities nearby.

Response:

Signature and the Port Authority assessed the potential impacts of the Proposed Action on air quality in accordance with FAA Order 1050.1G, Section 176(c) of the CAA, and 40 C.F.R. Part 93. As documented in Section 4.3 of the EA, Bergen County is designated as a serious nonattainment area for the 2015 8-hour ozone standard and a severe nonattainment area for the 2008 8-hour ozone standard. Accordingly, the air quality analysis was conducted consistent with the applicable federal conformity requirements.

Construction emissions were evaluated by using the largest development footprint among the reasonable action alternatives. As documented in Section 4.3.3.1 of the EA, emissions for the largest action alternative remained below the applicable *de minimis* thresholds established under the General Conformity Rule and would not result in exceedances of the NAAQS. Because the Proposed Action has a smaller development footprint than the analyzed worst-case alternative, construction emissions associated with the Proposed Action would likewise remain below the applicable thresholds.

The EA also qualitatively evaluated operational emissions. As described in Section 2.2.3 of the EA, the lack of adequate aircraft parking at Signature's existing facilities results in unnecessary ferry flights, which generate additional aircraft operations and associated emissions. The Proposed Action would address these operational deficiencies by reducing unnecessary ferry flights and improving aircraft parking efficiency. Compared to the No Action Alternative, the Proposed Action is projected to result in approximately 2.6 percent fewer total Airport operations and 3.4 percent fewer Signature operations, resulting in lower operational emissions than would otherwise occur.

Accordingly, the EA concludes that the Proposed Action would not result in significant air quality impacts and would not adversely affect the region's ability to attain or maintain the NAAQS. Moreover, the Proposed Action does not expand the Airport or increase its operational capacity; rather, it addresses existing operational deficiencies at Signature's leaseholds and is projected to reduce total Airport operations relative to the No Action Alternative. With respect to the commenter's reference to environmental justice, FAA Order 1050.1G does not identify environmental justice as a separate environmental impact category for analysis. Accordingly, environmental justice is not evaluated as a standalone resource in the EA. See also Topical Response TR-14.

LO004-16

Comment:

New Jersey’s Environmental Justice Law (N.J.S.A. 13:1D-157) requires state agencies to evaluate if a project will cause compounding environmental stressors to an already overburdened community. Eliminating a natural green buffer and replacing it with high-intensity, jet-fuel-heavy corporate infrastructure directly contradicts this mandate. Permitting this expansion actively violates the spirit and letter of these legal protections. It also further reduces available green space and increases an already astronomical percentage of impervious surface in the immediate region.

Response:

Please see Response LO004-10. The EA was prepared in accordance with NEPA, FAA Order 1050.1G, FAA Order 5050.4B, and other applicable federal requirements. Consistent with these requirements, the EA evaluated the reasonably foreseeable environmental effects of the Proposed Action, the No Action Alternative, and reasonable alternatives across the applicable environmental resource categories, including air quality, noise, biological resources, wetlands, surface waters, stormwater management, and floodplains. As documented in Section 4 of the EA, the Proposed Action would not result in significant environmental impacts.

As discussed in Section 4.8.3.3 of the EA, the Proposed Action was designed to comply with N.J.A.C. 7:8 through the incorporation of engineered stormwater management features, including underground detention systems and pervious pavement. The Engineer’s Reports provided in Appendix M demonstrate that the Proposed Action would not increase downstream flood hazards or adversely affect surrounding communities. In addition, unavoidable wetland impacts have been avoided and minimized to the maximum extent practicable and would be compensated through mitigation in accordance with applicable federal and state requirements.

The Proposed Action remains subject to all applicable state permitting requirements, including review by NJDEP. The EA provides the information necessary for the FAA to evaluate the environmental consequences of the Proposed Action under NEPA and supports the environmental reviews and permitting decisions required under applicable federal and state laws. Please also see Topical Responses TR-11 and TR-12.

LO004-17

Comment:

Conclusion

The permanent destruction of these wetlands cannot be adequately mitigated by artificial credits elsewhere. Because the applicant has failed to demonstrate compliance with Clean Water Act alternative standards, failed to prove public necessity, ignored FAA Public Use intentions, and introduced severe environmental and ethical liabilities to the Hackensack River watershed, we respectfully request that the reviewing agencies deny the wetland disturbance and waterfront development permits for this project.

Community health and wellbeing, as well as endangered natural resources, are worth more than corporate convenience and profit, and as such, this proposed expansion must not be approved.

Response:

Please see Responses LO004-2 through LO004-16. Signature and the Port Authority appreciate the review of the Draft EA and the comments provided. The issues raised in this letter have been carefully considered during preparation of the Final EA.

As described in the responses above, the EA was prepared in accordance with NEPA, FAA Orders 1050.1G and 5050.4B, and other applicable federal requirements. The EA evaluates the environmental consequences of the Proposed Action, No Action Alternative, and reasonable alternatives and provides the information necessary for the FAA to determine whether the Proposed Action would result in significant environmental impacts under NEPA. The Proposed Action also remains subject to all applicable federal, state, and local permitting requirements, including those administered by USACE and NJDEP.

LO006 TEANECK CREEK CONSERVANCY

Dempsey, Roxana

LO006-1

Comment:

On behalf of the Board of the Teaneck Creek Conservancy, we are writing to formally express our position regarding the proposed extension project at Teterboro Airport. As an organization dedicated to protecting, restoring, and nurturing our local waterways and green spaces, we view the preservation of our surrounding ecosystem as an enduring responsibility to our community.

While we understand the economic and logistical drivers behind regional infrastructure development, we believe that progress must not come at the expense of our invaluable natural resources. The proposed expansion directly threatens the delicate balance of the Teaneck Creek watershed and its adjacent habitats.

Response:

As demonstrated in Section 2.3 of the EA, the Proposed Action is not an expansion of the Airport. Rather, it consists of development at the existing Signature East and Signature South leaseholds through the construction of aircraft aprons, hangars, and associated support facilities on existing Airport property. The Proposed Action would not expand the Airport's property boundary or operational capacity. Instead, it would provide additional aircraft parking adjacent to Signature's existing facilities to improve operational efficiency and safety and accommodate existing and forecast demand within Signature's leaseholds. The Proposed Action would not authorize additional aircraft operations or expand the Airport beyond its existing role.

The EA was prepared in accordance with NEPA, FAA Order 1050.1G, FAA Order 5050.4B, and other applicable federal requirements. As documented in Section 4 of the EA, the FAA evaluated the environmental consequences of the Proposed Action, the No Action Alternative, and reasonable alternatives across the applicable environmental impact categories. The EA provides the information necessary for the FAA to determine whether the Proposed Action would result in significant environmental impacts and whether preparation of an EIS is required under NEPA. Based on the analyses presented in the EA, the Proposed Action would not result in significant impacts for any of the applicable environmental resource categories.

LO006-2

Comment:

Specifically, our board holds deep concerns regarding:
Watershed Degradation: Increased impervious surfaces (such as runways and tarmac) accelerate stormwater runoff, carrying aviation pollutants, heavy metals, and de-icing fluids directly into our local stream networks.

Response:

Please see Topical Response TR-13 regarding surface waters and stormwater management. The Proposed Action does not include construction of new runways; rather, it consists of aircraft parking aprons, hangars, and associated facilities on existing Airport property. The Proposed Action includes stormwater management improvements designed to comply with the New Jersey Stormwater Management Rules (N.J.A.C. 7:8), and stormwater from the proposed facilities would be managed through on-site best management practices designed to meet applicable water quality standards.

LO006-3

Comment:

Habitat Fragmentation: The expansion risks encroaching upon critical wetlands and nesting corridors for local wildlife, disrupting biodiversity that has taken decades to stabilize and protect.

Response:

Please see Topical Response TR-9 regarding biological resources and Topical Response TR-12 regarding wetlands.

LO006-4

Comment:

Community Quality of Life: Beyond the ecological impact, the resulting increase in noise, air pollution, and traffic heavily burdens the surrounding residential neighborhoods who rely on these green spaces for health and well-being not only for humans but also for the large population of wildlife which also includes the many migratory species that make this area as well as the immediately surrounding areas one of their stop-over points.

Response:

Please see Topical Response TR-8 regarding emissions, Topical Response TR-9 regarding biological resources, and Topical Response TR-10 regarding noise.

As identified in Section 4.2 of the EA, traffic levels from implementation of the Proposed Action were assessed as a part of the evaluation of Socioeconomics, Children's Environmental Health and Safety Risks. Construction-related traffic and employment would be temporary and minor. Following construction, the Proposed Action would not

increase aircraft operations, change aircraft types, or alter aircraft flight procedures. Although approximately 30 new employees are anticipated, the associated traffic would remain below the New Jersey Department of Transportation's threshold for a significant traffic impact (N.J.A.C. 16:47). The Proposed Action would also not introduce new environmental health or safety risks to children.

LO006-5

Comment:

The Teaneck Creek Conservancy has always operated on the principle that true community strength is built through long-term relationship building and mutual respect. We do not view environmental protection and regional development as mutually exclusive, but rather as a collaborative challenge that requires a professional, thorough, and transparent approach. High standards of environmental review are not hurdles to be cleared quickly; they are essential safeguards for our shared future.

Response:

Please see Response LO006-1. The Draft EA for the Proposed Action, including all technical appendices, was made available for public review during the 31-day public comment period from May 29, 2026, through 5:00 p.m. Eastern Time on June 29, 2026. The NOA announcing the availability of the Draft EA and the beginning of the public review period was published on May 29, 2026, in *The Star-Ledger*, *The Herald News*, and northjersey.com. In addition, notices announcing the availability of the Draft EA and its appendices were distributed electronically to interested agencies, organizations, and individuals. A physical copy of the Draft EA and appendices were also available to the public for review at the TEB Manager's Office, and at the Bergen County Clerk's Office during the comment period, as stated in the NOA.

LO006-6

Comment:

We strongly urge the planning committees, aviation authorities, and municipal leaders to halt further extension plans until a comprehensive, independent Environmental Impact Study is conducted and made fully available to the public. We also welcome the opportunity to meet with project representatives to discuss sustainable alternatives that honor both regional needs and ecological preservation.

Response:

As described in the responses above, the EA evaluates the potential environmental effects of the Proposed Action in accordance with NEPA, FAA Orders 1050.1G and 5050.4B, and other applicable federal, state, and local requirements. The information presented in the EA is intended to inform the FAA's decision-making process regarding the Proposed Action. Under NEPA, preparation of an EIS is required when a proposed federal action may result in significant environmental impacts. As documented in the EA, the analyses conducted for each applicable environmental resource category did not identify significant environmental impacts resulting from the Proposed Action.

PC001 DHULIPALA, NANCY

PC001-1

Comment:

I attended the recent presentation regarding the proposed Teterboro Airport Expansion Project and left with several significant concerns that I believe warrant further examination before any approvals are granted.

1. **Transparency Regarding "Unnecessary Ferry Flights"**

   Throughout the presentation, project representatives repeatedly cited "unnecessary ferry flights" as a primary justification for the proposed expansion. However, it remains unclear why these operational challenges appear to disproportionately affect Signature Aviation.

   Teterboro Airport serves numerous operators, including Tradewind Aviation, NetJets, Blade, Wheels Up, and others. If ferry flights are truly a systemic issue impacting airport efficiency, congestion, and environmental quality, the public should be provided with data demonstrating how all operators contribute to and are affected by this problem.

   Without transparent analysis, it is difficult to determine whether the proposed expansion addresses a genuine airport-wide need or primarily serves the business interests of a single operator.

Response:

Signature and the Port Authority prepared the EA in accordance with NEPA, DOT Order 5610.1D, and FAA Orders 1050.1G and 5050.4B. The Draft EA was made available for public review and includes the project's Purpose and Need, the FAA-approved aviation activity forecast (Appendix A), and the operational deficiencies the Proposed Action is intended to address.

As described in Sections 2.1 through 2.3 of the EA, the Proposed Action is limited to the redevelopment of Signature's existing Signature East and Signature South leaseholds. The Proposed Action does not expand the Airport, modify facilities operated by other FBOs, or evaluate improvements on other leaseholds. Accordingly, the Purpose and Need for the Proposed Action is based on the operational deficiencies identified at the Signature East and Signature South leaseholds rather than airport-wide operational issues.

As described in Section 2 of the EA, the Proposed Action is intended to address operational deficiencies specific to the Signature East and Signature South leaseholds. Demand for Signature's facilities currently exceeds available apron and hangar capacity, resulting in apron congestion, increased aircraft idling, unnecessary ferry flights, and operational inefficiencies that affect the safe and efficient movement of aircraft. In addition, the size of the modern business aviation fleet has reduced the efficiency of the existing aircraft parking configuration, further contributing to these operational deficiencies. As documented in the FAA-approved aviation activity forecast (Appendix A), these conditions are expected to persist and worsen under the No Action Alternative as demand for Signature's facilities continues to increase.

As discussed in Sections 2.2.3 and 2.2.4 of the EA, inadequate aircraft parking capacity at the Signature East and Signature South leaseholds contributes to ferry flight operations associated with those facilities. Ferry flights generate two additional aircraft operations for each aircraft repositioning event and contribute to apron congestion, airspace congestion, aircraft noise, and emissions. The Proposed Action is intended to alleviate aircraft parking congestion and reduce ferry flights associated with Signature's operations by providing additional aircraft parking and hangar capacity adjacent to its existing facilities.

As discussed in Section 3.3.1 of the EA, under existing conditions, pilots have the option of using other FBO facilities when Signature facilities are full; however, based on the number of ferry flights and number of times annually Signature is operating under congested conditions, all of the existing FBOs at TEB are experiencing congested conditions during peak periods which often spills over onto active taxiways. Without the proposed improvements to aircraft apron space, hangars, and supporting facilities, Signature would continue to experience operational

inefficiencies and safety risks at their existing facilities, as well as overall Signature-related ferry flights at TEB. Note that since 2023, aircraft that operated at TEB's Signature facilities constitute over 70 percent of total airport operations.

PC001-2

Comment:

2. Evaluation of Alternative Parking Solutions

The proposal calls for approximately 28,700 square feet of additional aircraft parking. Given the scarcity of available land and the environmental sensitivity of the project area, I question whether alternative parking solutions have been adequately evaluated.

Airports and transportation facilities around the world routinely utilize vertical infrastructure to maximize operational capacity while minimizing land consumption. A two- or three-story parking structure, or other innovative storage solutions, could significantly reduce the footprint required for aircraft storage and related operations.

The public deserves to understand why such alternatives were rejected before additional land is permanently committed to development.

Response:

In accordance with FAA Orders 1050.1G and 5050.4B, Section 3 of the EA describes the alternatives considered for the Proposed Action and the screening process used to identify the practicable alternatives that satisfy the Purpose and Need. The alternatives analysis evaluated the No Action Alternative, use of other airports, use of other modes of transportation, other FBO facilities, development at other locations on TEB, and multiple redevelopment configurations for the Signature East and Signature South leaseholds. Additional information regarding the alternatives analysis is provided in Section 3 and Appendix D of the EA.

As part of the on-airport alternatives analysis, Signature evaluated multiple facility layouts and development footprints to minimize environmental impacts while providing the aircraft parking, apron, hangar, terminal, and support facilities necessary to accommodate existing and forecast demand. The proposed layouts were developed in accordance with FAA AC 150/5300-13B and ACRP Report 113. Among the practicable alternatives evaluated, the selected configuration represents the smallest practicable development footprint that satisfies the Purpose and Need for the Proposed Action while minimizing impacts to wetlands and other environmental resources.

Signature understands that there are multi-level aircraft parking structures or other vertical storage solutions available to airports to reduce the footprint of aircraft parking facilities. However, existing multi-level aircraft parking systems are generally designed for smaller piston-engine aircraft, not the larger turbine-powered business jet aircraft that constitute the predominant fleet at TEB. In addition, vertical storage elevations at TEB are constrained by FAA Part 77 imaginary surfaces and other safety surfaces that limit the permissible height of structures in proximity to the airfield. Aircraft parking and maneuvering areas must provide direct access to the airfield and maintain the separation distances, wingtip clearances, pavement strength, object free areas, and operational safety standards established by the FAA for aircraft movement and parking. Unlike automobile parking, all aircraft types cannot be routinely stored in multi-level parking structures while maintaining safe and efficient access to the airfield. Accordingly, a multi-level aircraft parking facility would not represent a practicable alternative for accommodating the existing and projected fleet and operational needs of the Proposed Action and was not carried forward for further evaluation.

Since publication of the Draft EA, the footprint of the Proposed Action has been further reduced to minimize wetland impacts. As documented in Section 3 and Appendix K, the selected configuration minimizes impacts to wetlands and other environmental resources to the maximum extent practicable while satisfying the Purpose and Need for the Proposed Action.

PC001-3

Comment:

3. Lack of Consideration for Innovative Aviation Infrastructure

Most concerning is the apparent lack of consideration given to modern aviation infrastructure technologies that could reduce or eliminate the need to fill protected wetlands.

During discussions with Signature Aviation representatives, I received no satisfactory explanation as to why proven alternatives were not evaluated. A simple review of existing airport innovations reveals several examples of space-efficient solutions already in operation worldwide.

One example is the Schaetz Aircraft Carousel system at Seletar Airport in Singapore. This technology functions much like a large rotating carousel, moving aircraft between ground and mezzanine levels. The system can accommodate up to 14 aircraft while occupying a significantly smaller footprint than traditional parking arrangements. By utilizing vertical space, it effectively doubles aircraft parking capacity while reducing land consumption, construction materials, and operational costs.

Another example can be found in Shenzhen, China, where innovative vertical aviation infrastructure has been developed to address space limitations. Similar concepts, including stacked aircraft storage and vertiport systems, demonstrate that airports can increase capacity without expanding into environmentally sensitive areas.

While these examples may not be directly applicable to Teterboro in their current form, they illustrate that innovative alternatives exist and deserve serious evaluation before wetlands are disturbed.

Response:

As discussed in Response PC001-2, the alternatives analysis evaluated multiple facility configurations to minimize environmental impacts while satisfying the Purpose and Need for the Proposed Action. Signature and the Port Authority acknowledge that airport technologies continue to evolve. However, the Proposed Action was developed using established FAA airport design standards and operational requirements applicable to Teterboro Airport. Aircraft parking aprons, taxilanes, and hangar facilities must provide direct aircraft access to the movement area while maintaining the separation distances, wingtip clearances, pavement strength, object free areas, and other design standards specified in FAA AC 150/5300-13B. As the commenter acknowledges, these technologies may not be directly applicable to Teterboro Airport in their current form. As discussed in Response PC001-2, existing multi-level aircraft parking systems are generally designed for smaller piston-engine aircraft, not the larger business jet aircraft that constitute the predominant fleet at TEB, and vertical storage elevations are further constrained by FAA Part 77 surfaces at the Airport. The vertiport and vertical storage systems cited by the commenter were developed for different aircraft types and operational environments and do not represent established or FAA-approved design solutions for GA aircraft parking and movement at Teterboro Airport. Accordingly, these systems were not determined to be practicable alternatives for satisfying the Purpose and Need for the Proposed Action.

Beyond these technology-specific considerations, an analysis of alternatives to avoid, minimize, and compensate for impacts to wetlands was completed in accordance with the Section 404(b)(1) Guidelines of the CWA, EO 11990, and DOT Order 5660.1A. As documented in Appendix K, no practicable avoidance alternative was identified that satisfied the Purpose and Need for the Proposed Action. Multiple on-airport configurations were evaluated to minimize wetland impacts, and the selected configuration represents the smallest practicable development footprint that satisfies the Purpose and Need while minimizing impacts to wetlands. Since publication of the Draft EA, the footprint of the Proposed Action has been further reduced to minimize wetland impacts from 11.0 acres to 10.9 acres. Additional information regarding wetland impact avoidance and minimization is provided in Appendix K and Section 4.8.3.3 of the Final EA.

PC001-4

Comment:

4. Concerns About Future Expansion and Larger Aircraft Operations

This proposal also raises broader questions about the future of Teterboro Airport.

If Signature Aviation requires expansion into wetlands today, what assurances do New Jersey residents have that other operators will not seek similar expansions in the future? Will this project establish a precedent for continued encroachment into environmentally sensitive areas?

After reviewing the Facilities Redevelopment Project Draft Environmental Assessment (CEQ ID Number: EAXX-021-12-ARP- 1769096488), it appears there may be an expectation that larger aircraft will increasingly utilize Teterboro Airport. If that is the case, the public deserves greater transparency regarding long-term operational forecasts, anticipated aircraft size trends, and the cumulative environmental impacts of future growth.

Before this project advances to the next stage, I urge decisionmakers to provide a more comprehensive public analysis of:

- Ferry flight activity across all airport operators
- Alternative space-saving infrastructure options
- The necessity of wetland impacts versus available alternatives

- Long-term growth projections and future expansion plans
- The anticipated role of larger aircraft at Teterboro Airport

These issues deserve full public disclosure and discussion before irreversible environmental impacts are approved.

Thank you,

Response:

Please see Responses to PC001-1, PC001-2, and PC001-3. As described in Section 2.3 of the EA, the Proposed Action consists of redevelopment of the existing Signature East and Signature South leaseholds through construction of aircraft aprons, hangars, terminal facilities, and associated support infrastructure on existing Airport property. The Proposed Action would not expand the Airport property boundary, add runways or taxiways, or otherwise increase the Airport's operational capacity. Rather, it would improve aircraft parking, circulation, and operational efficiency within Signature's existing leaseholds.

Implementation of the Proposed Action would not increase total aircraft operations compared to the No Action Alternative. Future aircraft activity at Teterboro Airport is driven by regional aviation demand and FAA air traffic management, not by the construction of airport facilities. Signature prepared an FAA-approved aviation activity forecast documenting projected aircraft operations at TEB and activity specific to Signature's facilities over a 20-year planning period (see Section 1.2.2 and Appendix A of the EA). The forecast projects that Signature operations would increase from 127,242 in 2024 to 197,633 in 2044, representing a CAGR of approximately 2.2 percent, while total TEB operations are projected to increase at a similar CAGR of approximately 2.1 percent. The proposed improvements are intended to accommodate existing and forecast demand within Signature's leaseholds and do not authorize additional aircraft operations.

Approval of the Proposed Action does not establish a precedent for future airport development or authorize future expansion projects. Any future airport development requiring FAA approval would be subject to its own environmental review under the applicable laws, regulations, and FAA guidance in effect at that time.

Signature and the Port Authority prepared the EA in accordance with Section 102 of NEPA, DOT Order 5610.1D, and FAA Orders 1050.1G and 5050.4B. Consistent with the CEQ memorandum issued on February 19, 2025, federal agencies evaluate the reasonably foreseeable effects of a proposed action under Section 102 of NEPA. CEQ finalized the rescission of its regulations on January 8, 2026. Accordingly, FAA Order 1050.1G does not require a separate cumulative effects analysis. Instead, the EA evaluates the reasonably foreseeable environmental effects of the Proposed Action, the reasonable alternatives, and the No Action Alternative. As documented throughout Section 4 of the EA, Signature and the Port Authority considered the reasonably foreseeable environmental effects of the Proposed Action, including the effects of Port Authority projects at TEB that are reasonably expected to occur within the next five years. The EA does not evaluate projects outside TEB property or projects anticipated beyond this timeframe because any environmental effects associated with those projects do not have a reasonably close causal relationship to the Proposed Action and would therefore be speculative. Similarly, the EA does not evaluate projects proposed or initiated by parties other than the Port Authority or Signature because implementation of those projects is uncertain and dependent on future approvals, funding, and operational needs.

The Port Authority identified four reasonably foreseeable projects expected to occur within the next five years: (1) Rehabilitation of Various Taxiways and the Hangar 1 Ramp; (2) Installation of an Aircraft Run-up Pad; (3) Airport Perimeter Fencing; and (4) Installation of a Runway 6 EMAS. These projects are described in Appendix N (Footnotes 38 through 41), and their reasonably foreseeable environmental effects were considered, as appropriate, in the environmental resource analyses presented in Section 4 of the EA.

PC005 LAVERTY, TAMMY

PC005-1

Comment:

Would you please direct me to the website & area where the Teterboro Public Program mounted slides that were shown to the public onl 6/17 at Holiday Inn in Hasbrouck Heights?

Response:

The Port Authority provided a response to this commenter on June 18, 2026, as shown below:

Thank you for your email. The Draft Environmental Assessment, along with the Public Workshop Boards can be accessed at the following webpage - Port Authority Studies & Reports | Port Authority of New York and New Jersey.

PC005-2

Comment:

thank you for your quick response. Do you have a link to the form that was supplied at the workshop last night? I would like to send it to a friend.

Response:

The Port Authority responded on June 18, 2026, as shown below:

The comment form from the public workshop has been attached to this email.

Thank you.

PC027 HACKENSACK ENVIRONMENTAL COMMISSION AND GREEN TEAM

PC027-1

Comment:

The Hackensack Environmental Commission and Green Team registers our strong opposition to the Draft Environmental Assessment for the TEB Facilities Redevelopment Project at Teterboro Airport, and expresses deep concern over how this proposal treats the communities that surround that airport. This project asks the towns of Teterboro, Hackensack, Moonachie, Little Ferry, and the surrounding Meadowlands communities to absorb the consequences of a private corporation's expansion plans, while the benefits flow almost entirely to Signature Flight Support and the operators it serves. That is not a fair trade, and it should not be treated as a routine planning matter.

Response:

As described in Section 2 of the EA, the Proposed Action is intended to address documented operational deficiencies at the existing Signature East and Signature South leaseholds, including limited aircraft parking capacity, apron congestion, unnecessary ferry flights, and operational inefficiencies affecting the safe and efficient movement of aircraft. The Proposed Action consists of the redevelopment of existing lease areas and would not expand Airport property, add runways or taxiways, increase the Airport's operational capacity, or authorize additional aircraft operations. Please also see Topical Response TR-4.

TEB is a public-use, non-primary reliever airport that serves an important role in the National Airspace System by accommodating general aviation activity and relieving congestion at the region's commercial service airports. Under 49 U.S.C. § 47107(a) and the associated FAA Airport Sponsor Grant Assurances, the Port Authority, as the airport sponsor, is responsible for operating and maintaining the Airport in a safe and efficient manner while making it available to aeronautical users on reasonable and nondiscriminatory terms.

The EA was prepared in accordance with NEPA, FAA Order 1050.1G, FAA Order 5050.4B, and other applicable federal requirements. As documented in Section 4 of the EA, the FAA evaluated the environmental consequences of the Proposed Action, the No Action Alternative, and reasonable alternatives, including potential effects on surrounding communities. The Proposed Action was developed to avoid and minimize environmental impacts to the maximum extent practicable while meeting the project's Purpose and Need, and the analyses conclude that it would not result in significant environmental impacts.

PC027-2

Comment:

The Draft EA itself acknowledges that this project would affect approximately 11 acres of jurisdictional wetlands in the Berrys Creek sub-watershed, part of the larger Hackensack, Hudson, and Pascack Watershed Management Area, and that it would encroach further on the 100-year regulated floodplain at an airport that already sits inside that floodplain. These are not minor technical footnotes.

Response:

Signature and the Port Authority evaluated potential impacts to wetlands, stormwater management, surface waters, and floodplains in accordance with FAA Order 1050.1G, the CWA Section 404(b)(1) Guidelines, EOs 11990 and 11988, DOT Orders 5660.1A and 5650.2, and the N.J.A.C. 7:8. NJDEP, which has regulatory authority over these resources, was consulted throughout preparation of the EA.

Please see Topical Response TR-11 regarding floodplain impacts and Topical Response TR-12 regarding wetland impacts and proposed mitigation. As documented in the EA and Appendix K, the Proposed Action has been designed to avoid and minimize wetland impacts to the maximum extent practicable, and the development footprint has been reduced since publication of the Draft EA from 11.0 acres to 10.9 acres. Proposed mitigation for unavoidable wetland impacts is described in Appendix K.

PC027-3

Comment:

The Hackensack Meadowlands have spent decades absorbing the cumulative environmental damage of exactly this kind of incremental encroachment, one project at a time, each one described as too small to matter on its own. At some point the cumulative impact has to be reckoned with honestly, and this project should be the occasion for that reckoning, not another exemption from it.

Response:

The EA was prepared in accordance with Section 102 of NEPA, DOT Order 5610.1D, and FAA Orders 1050.1G and 5050.4B. Consistent with the CEQ's February 19, 2025, memorandum and FAA Order 1050.1G, the EA evaluates the reasonably foreseeable environmental effects of the Proposed Action, the No Action Alternative, and reasonable alternatives. Rather than preparing a separate cumulative effects analysis, the EA considers the reasonably foreseeable effects of the Proposed Action together with other projects that have a reasonably close causal relationship to the Proposed Action. Please also see Topical Response TR-15.

Accordingly, the EA considered other airport development projects proposed by the Port Authority that are reasonably expected to occur within the next five years. Projects outside Airport property, projects anticipated beyond this planning horizon, or projects proposed by unrelated parties were not included because they do not have a sufficiently close causal relationship to the Proposed Action or are too speculative to support meaningful environmental analysis.

As documented in Section 4 of the EA, the potential environmental effects of these reasonably foreseeable projects were considered, as appropriate, in the evaluation of the applicable environmental resource categories, including wetlands, floodplains, water resources, air quality, noise, and biological resources. Based on these analyses, the EA concludes that the Proposed Action would not result in significant environmental impacts.

PC027-4

Comment:

Beyond the environmental impact, this proposal raises serious safety concerns for the densely populated municipalities that surround Teterboro Airport. Additional apron space and hangar capacity means more aircraft movements concentrated in and around a general aviation airport that already operates in extremely close proximity to homes, schools, and businesses across multiple towns. Expanding capacity to accommodate forecast demand without a serious, transparent accounting of the added noise, traffic, and operational risk to the surrounding community is not responsible planning. It is growth for growth's sake, prioritized over the safety and quality of life of the people who live under that flight path every day.

Response:

Please see Response to PC027-1. Signature and the Port Authority prepared the EA in accordance with NEPA, DOT Order 5610.1D, FAA Orders 1050.1G and 5050.4B, and other applicable federal requirements.

As described in Section 2.3 of the EA, the Proposed Action consists of the redevelopment of the existing Signature East and Signature South leaseholds through the construction of aircraft apron, hangars, and associated support facilities on existing Airport property. The Proposed Action would not expand Airport property, add runways or taxiways, increase the Airport's operational capacity, or authorize additional aircraft operations. Rather, the additional aircraft parking and hangar space are intended to accommodate existing and forecast demand within Signature's existing leaseholds while improving aircraft parking efficiency and reducing operational deficiencies, including apron congestion, unnecessary ferry flights, and aircraft repositioning.

As documented in the FAA-approved aviation activity forecast (Appendix A) and the analyses presented in Section 4 of the EA, the Proposed Action would not increase aircraft operations compared to the No Action Alternative. The EA evaluated the potential effects of the Proposed Action on noise, air quality, and other applicable environmental resource categories. Based on these analyses, the Proposed Action would not result in significant environmental impacts and would improve the safe and efficient movement of aircraft within the Signature facilities. For additional discussion of specific resource topics raised in this comment, see Topical Response TR-5 regarding ferry flight reductions, Topical Response TR-8 regarding air quality, and Topical Response TR-10 regarding noise.

PC027-5

Comment:

This proposal also cannot be evaluated in isolation. With PILOT, Payment In Lieu Of Taxes, programs already driving a wave of new apartment construction across these same municipalities, the surrounding communities are absorbing a sharp rise in residency, traffic, and supporting infrastructure at the same time this project proposes to add still more airport capacity on top of it.

Layering an airport expansion onto towns that are simultaneously being asked to absorb major residential growth is an overload these municipalities cannot reasonably be expected to take. There has to be a point at which growth driven purely by profit gives way to the basic obligation to protect the people who live here, and that point has already been reached. To treat this community as an afterthought to a profit margin, rather than as a stakeholder whose safety and quality of life must come first, is irresponsible and it is not sustainable.

Response:

Please see Responses to PC027-1, PC027-3, and PC027-4. As described in Section 2.3 of the EA, the Proposed Action consists of the redevelopment of the existing Signature East and Signature South leaseholds through the construction of aircraft apron, hangars, and associated support facilities on existing Airport property. The Proposed Action would not expand Airport property, add runways or taxiways, increase the Airport's operational capacity, or authorize additional aircraft operations. Rather, it provides additional aircraft parking adjacent to existing facilities to improve operational efficiency and safety while accommodating existing and forecast demand within Signature's existing leaseholds.

The EA was prepared in accordance with NEPA, DOT Order 5610.1D, FAA Orders 1050.1G and 5050.4B, and other applicable federal requirements. Consistent with the CEQ's February 19, 2025, memorandum and FAA Order 1050.1G, the EA evaluated the reasonably foreseeable environmental effects of the Proposed Action together with other projects having a reasonably close causal relationship to the Proposed Action. Accordingly, the EA considered other airport development projects proposed by the Port Authority that are reasonably expected to occur within the next five years. Residential, commercial, and other off-Airport developments referenced in the comment were not included because they are not part of the Proposed Action, are not proposed by the project sponsors, and do not have a sufficiently close causal relationship to the Proposed Action.

As documented in Section 4 of the EA, the environmental effects of the Proposed Action and these reasonably foreseeable projects were evaluated across the applicable environmental resource categories. Based on these analyses, the EA concludes that the Proposed Action would not result in significant environmental impacts.

PC027-6

Comment:

I recognize that Teterboro Airport plays a role in the regional economy, and that Signature Flight Support has a legitimate business interest in expanding its facilities. But the burden of that expansion, wetland loss, floodplain encroachment, increased operational density, falls on communities that have no comparable stake in the profits it generates.

Response:

Please see Responses PC027-1, PC027-2, and PC027-5. As documented in Section 1.2 of the EA, TEB is the region's primary airport for non-commercial aviation activity and is classified by the FAA as a national public-use, non-primary reliever airport. Reliever airports are intended to accommodate general aviation activity and reduce congestion at commercial service airports while remaining available to aeronautical users on reasonable and nondiscriminatory terms.

As described in Section 2.3 of the EA, the Proposed Action consists of the redevelopment of the existing Signature East and Signature South leaseholds through the construction of aircraft apron, hangars, and associated support facilities on existing Airport property. The Proposed Action would not expand Airport property, add runways or taxiways, increase the Airport's operational capacity, or authorize additional aircraft operations. Rather, it provides

additional aircraft parking adjacent to existing facilities to improve operational efficiency and safety while accommodating existing and forecast demand within Signature's existing leaseholds.

Consistent with NEPA, FAA Order 1050.1G, and FAA Order 5050.4B, the EA evaluated the reasonably foreseeable environmental effects of the Proposed Action, the No Action Alternative, and reasonable alternatives, including potential effects on surrounding communities. As documented in Section 4 of the EA, the analysis considered impacts to wetlands, floodplains, stormwater management, noise, air quality, economic conditions and quality of life. Based on these analyses, the Proposed Action would not result in significant environmental impacts.

PC027-7

Comment:

A single public workshop and a comment period are not an adequate substitute for a genuine, good-faith partnership with the towns being asked to bear these costs.

Response:

The EA was prepared in accordance with FAA Order 1050.1G. Although FAA Order 1050.1G does not require public review or a public workshop for every EA, Signature and the Port Authority, in coordination with the FAA, elected to make the Draft EA available for public review and to hold a public workshop to provide interested agencies, organizations, and members of the public an opportunity to learn about the Proposed Action and provide comments for consideration during the environmental review process.

PC027-8

Comment:

The committee urges the Port Authority to reject this Draft EA as currently written, require a full accounting of cumulative wetland and floodplain impacts across past and pending Teterboro projects, and demonstrate, with specifics rather than reassurances, how the safety and environmental interests of these communities will be protected before any redevelopment moves forward.

Response:

Please see Responses PC027-1, PC027-2, and PC027-3. As documented in the EA, the environmental analyses conducted for each applicable resource category, including wetlands, floodplains, water resources, air quality, noise, and biological resources, did not identify significant environmental impacts resulting from the Proposed Action. The information presented in the EA is intended to inform the FAA's decision-making process regarding the Proposed Action and its potential effects on surrounding communities.

PC037 HACKENSACK ENVIRONMENTAL JUSTICE ALLIANCE
DEL VECHIO, PEDRA

PC037-1

Comment:

As a grassroots organization dedicated to improving the environment for everyone in our community, the Hackensack Environmental Justice Alliance strongly opposes the Teterboro Airport Facilities Redevelopment Project. The project area is in the Hackensack Meadowlands wetlands and is protected under Department of Transportation Preservation of the Nation's Wetlands Order 5660.1A and the Environmental Protection Agency's Executive Order

11990, known as Protection of Wetlands. Both of these orders require wetlands to be protected "to the fullest extent practicable" when considering construction of transportation facilities.

Wetlands such as these are often referred to as the lungs and kidneys of the earth. They help to regulate excessive carbon and prevent pollutants from entering the ground water. In the increasingly common heavy rainstorms, the wetlands act as a sponge to absorb the tremendous runoff from nearby highways, runways, and tarmacs. Removing or filling in any portion of this important ecosystem is unacceptable.

Response:

Impacts to wetland resources are addressed in Topical Response TR-12.

PC037-2

Comment:

Hackensack as well as the other towns surrounding Teterboro Airport have long been burdened by flooding, jet exhaust and noise pollution. It is appalling that the airport wants to increase the harm caused by their operations.

Response:

Impacts to floodplain resource are addressed in Topical Response TR-11; aviation emissions and air quality concerns are addressed in Topical Response TR-8; and noise impacts are addressed in Topical Response TR-10. Furthermore, as discussed in Topical Response TR-3, the Proposed Action would reduce aircraft operations relative to the No Action Alternative.

PC037-3

Comment:

Since 2003, there have been no commercial or commuter airline services flown in or out of Teterboro. The airport is entirely devoted to the service of the economic elite. This airport serves no transportation benefit to the local community, yet the environmental burden falls on those who can't afford to use it. We should not be expected to sacrifice our health and environmental resources for the convenience of private and chartered jets.

Response:

See Topical Responses TR-1 and TR-2. The EA was prepared in accordance with NEPA, DOT Order 5610.1D, FAA Orders 1050.1G and 5050.4B, and other applicable federal requirements. As documented in Section 4 of the EA, the environmental effects of the Proposed Action were evaluated in accordance with these requirements. Based on these analyses, the EA concludes that the Proposed Action would not result in significant environmental impacts.

PC037-4

Comment:

Additionally, these wetlands support a diverse population of migratory and nesting birds. The area under discussion is habitat for the Northern Harrier, Peregrine Falcon, Osprey, Bald Eagle, Northern Diamondback Terrapin, and several other state-listed endangered species. Northern New Jersey has a very limited amount of open space left. Allowing Teterboro to destroy this important habitat would be a tragedy.

We urge you to reconsider this project.

Response:

Signature assessed the potential for impacts to biological resources in accordance with FAA Order 1050.1G. The USFWS and NJDEP have regulatory authority over biological resources in the Direct Study Area. As a part of development of the EA, Signature consulted with both the USFWS and NJDEP. Agency consultation is included in Appendix H of the EA. As documented in Section 4.4 of the EA, the USFWS does not identify any designated critical habitat for protected species within the project area. With respect to the specific species referenced in the comment, the EA evaluated potential effects on avian species, including raptors such as the Bald Eagle, Peregrine Falcon, Osprey, and Northern Harrier, as well as other wildlife. The project area does not contain suitable nesting habitat for these species, which is attributable to the highly developed airport environment, active vegetation management under the WHMP, and the disturbed nature of the on-site wetlands. Similarly, the northern diamondback terrapin is an estuarine species associated with coastal salt marshes and sandy nesting beaches, habitat types that are not present within the project area. The project area also does not provide suitable habitat to support other state-listed species under the jurisdiction of NJDEP. This was confirmed by results received from the New Jersey Natural Heritage Program (NHP) for both the Signature South (NHP File #25-4007471-34459) and Signature East (NHP File #25-4007471-34458) sites which indicated that Northern Harrier, Peregrine Falcon, Osprey, Bald Eagle, and northern diamondback terrapin or their habitat are not present on either site.

The Proposed Action and its alternatives are unlikely to adversely affect avian species, including migratory birds protected under the MBTA, due to the developed nature of the project area, which primarily consists of maintained vegetation, disturbed habitat, and pavement. The Airport is actively managed in accordance with the FAA-approved WHMP, which includes provisions to minimize wildlife attractants and to deter and discourage birds from Airport property, where the Proposed Action is located. With implementation of the WHMP, the presence of migratory birds and other wildlife within the project area is anticipated to be limited. The wetlands within the project area also lie within the highly developed landscape of the Airport, abutting pavement in service of flight activity (tarmac and taxiways), which regularly generate noise that generally reduces the use of wetlands by migratory birds and other wildlife. Further, on-site hardwood communities at both sites are stunted in growth by a combination of prior land use (grading, stockpiling, etc.), vegetation management (cutting), hydrology, soils (nutrient depauperate), and local environmental conditions (both sites are adjacent to jet airplane parking and taxiing areas that experience significant impacts from jet engine exhaust and noise). However, to ensure no adverse effects on protected avian species, Signature and the Port Authority will implement the conservation measures recommended by the USFWS and detailed in Section 4.4.3.3 of the EA.

Overall, the Proposed Action or the other action alternative configurations would not result in significant impacts on biological resources. Although some vegetated and wetland areas would be filled (see Section 4.8.3), these areas have been previously disturbed and do not contain preferred habitat for protected species. As described in Section 4.8.3.3 of the EA, unavoidable wetland impacts would be compensated through the purchase of mitigation credits from approved mitigation banks within the same watershed, thereby preserving wetland functions and values at the regional level.

PC060 YOUNG, KAREN

PC060-1

Comment:

The Facilities Redevelopment Project Draft Environmental Assessment indicated that Aviation forecasts based on local socioeconomic factors and historical trends were used to identify the number and type of aircraft operations anticipated to occur at an airport.

Response:

Signature prepared an FAA-approved aviation activity forecast documenting projected aircraft operations at TEB and activity specific to Signature's facilities over a 20-year planning period (see Section 1.2.2 and Appendix A of the EA). The FAA-approved aviation activity forecast projects future aircraft operations at TEB independent of the Proposed Action based on historical activity, socioeconomic conditions, and other accepted forecasting factors. Under the forecast, Signature operations are projected to increase from 127,242 in 2024 to 197,633 in 2044, representing a CAGR of 2.2 percent, compared to a forecast CAGR of 2.1 percent for total TEB operations. As a result, Signature's share of total airport operations is projected to increase from 73.8 percent in 2024 to 75.8 percent in 2044. This projected growth reflects continued demand for Signature's facilities at TEB.

The aviation activity forecast also evaluated trends in the aircraft fleet accommodated at Signature's facilities. Historically, large and medium jets have represented the majority of Signature operations at TEB and are forecast to experience the highest growth, with CAGRs of 2.3 percent and 2.2 percent, respectively. Small jets and other aircraft are forecast to grow at a CAGR of 2.1 percent. The forecast indicates that both aircraft operations and the proportion of larger aircraft using Signature's facilities are projected to increase. As a result, demand for aircraft parking and hangar space is expected to continue to grow. Without the additional aircraft parking and hangar capacity provided by the Proposed Action, the growing fleet is expected to exacerbate existing deficiencies in apron and hangar space (see Section 2.2.1), increase ferry flights (see Section 2.2.3), and contribute to continued operational inefficiencies (see Section 2.2.4) at Signature facilities.

PC060-2

Comment:

According to the US Census bureau, the surrounding communities are either low income and/or minority, also known as overburdened communities. Teterboro total population is reported as 1,068 with 749 total minority and 36.78 percent below poverty. Little Ferry total population is 2,397, 1103 minority and 3.4 percent poverty. Therefore, the Environmental Assessment needs to address the socioeconomic stressors that increasing air traffic noise and pollution will have on the surrounding communities.

Response:

Consistent with FAA Order 1050.1G, Signature and the Port Authority considered the reasonably foreseeable environmental effects of the Proposed Action, the action alternatives, and the No Action Alternative. FAA Order 1050.1G does not identify environmental justice as a separate environmental impact category for analysis. Accordingly, this topic is not evaluated as a standalone resource category in this EA. Instead, the EA evaluates the environmental impact categories identified in FAA Order 1050.1G, including air quality, noise and noise-compatible land use, water resources, biological resources, and other applicable resources. As documented throughout Section 4 of the EA, the Proposed Action would not result in significant impacts to any of these environmental resource categories.

With respect to air quality, Signature evaluated construction and operational emissions in accordance with FAA Order 1050.1G, the Clean Air Act, and 40 CFR Part 93 (General Conformity). As documented in Section 4.3 of the EA, estimated construction emissions for the largest development footprint evaluated in the alternatives analysis would be below the applicable *de minimis* conformity thresholds for all criteria pollutants. Because the Proposed Action has a smaller development footprint than the alternatives analyzed, emissions associated with the Proposed Action would also remain below the applicable thresholds and would not cause or contribute to an exceedance of the NAAQS. The NAAQS are established by the USEPA to protect public health, including sensitive populations. During construction, Signature and the Port Authority will also comply with applicable NJDEP regulations governing equipment emissions, idling, fugitive dust control, and related air quality requirements.

Signature also evaluated the Proposed Action for potential noise impacts in accordance with FAA Order 1050.1G. As described in Section 4.7 of the EA, the Proposed Action would not change runway configurations, aircraft flight tracks, aircraft types, or increase aircraft operations. Instead, the additional aircraft parking capacity would reduce the need for aircraft ferry flights. Compared to the No Action Alternative, the Proposed Action is forecast to result in approximately 2.6 percent fewer total airport operations and 3.4 percent fewer Signature operations, thereby reducing ferry-flight-related noise. Because the Proposed Action would not result in changes that could increase aircraft noise exposure, it would not have the potential to cause significant noise impacts as defined in FAA Order 1050.1G.

Accordingly, the Proposed Action would not result in significant air quality, noise, socioeconomic, or children's health and safety impacts, as evaluated in the EA.

PC060-3

Comment:

The Facilities Redevelopment Project Draft EA indicates that the need for the action is to accommodate the forecasted increase and percentage of large jet aircraft. The forecast to grow from approximately 172,500 operations to 260,900 operations in 2044 should not be approved.

Response:

The Proposed Action would not add runways or taxiways or otherwise increase the Airport's capacity to accommodate additional aircraft operations. As described in the EA, implementation of the Proposed Action would not increase total aircraft operations compared to the No Action Alternative. Future aircraft activity at TEB is driven by regional aviation demand and FAA air traffic management, not by the construction of airport facilities. The forecasted increase in aircraft operations is not the Proposed Action and is not being approved as part of this EA. Rather, the forecast provides the planning basis for evaluating the need for the Proposed Action and assessing its potential environmental effects over the 20-year planning period. Signature prepared the aviation activity forecast in accordance with FAA forecasting guidance, and the forecast was reviewed and approved by the FAA (see Section 1.2.2 and Appendix A of the EA).

TEB serves as the region's primary airport for general aviation access to New York City, and operators continue to choose TEB because of its proximity and convenience. As a result, demand for the Airport has remained consistently high. With the exception of the temporary decline during the COVID-19 pandemic in 2020 and 2021, TEB has accommodated between approximately 155,000 and 175,000 aircraft operations annually since 2013 (see Exhibit 1-2 of the EA). During this time period, the Airport reached its highest annual activity level in 2017, with approximately 175,000 aircraft operations, although TEB routinely handled more than 200,000 annual aircraft operations between 1997 and 2007, with a peak of 264,400 operations in 2000. Although operations declined to approximately 85,000 in 2020 during the COVID-19 pandemic, annual activity exceeded pre-pandemic (2019) levels in both 2023 and 2024, while remaining below the 2017 peak. Signature's operations increased from 31,760 in 2013 to 127,242 in 2024, reflecting continued demand for aircraft parking, hangar space, and related services at TEB.

The FAA-approved forecast projects Signature operations to increase from 127,242 in 2024 to 197,633 in 2044, representing a CAGR of approximately 2.2 percent. Total TEB operations are forecast to increase at a similar annual rate of approximately 2.1 percent over the same period. The forecast also projects Signature's share of total airport operations to increase from 73.8 percent in 2024 to 75.8 percent in 2044. These forecasts reflect anticipated demand for general aviation services at TEB and were used to evaluate the facility needs and environmental effects of the Proposed Action.

PC060-4

Comment:

TEB is a small airport facility that accommodates private jet users. The increase in private jet users within an airport that is surrounded by overburdened communities in effect accommodates the wealthy and pollutes the minority and poor. Environmental Justice initiatives are in place to counteract this very situation. The wealthy can add from ½ to one hour additional time to their commute to accommodate the area.

Response:

Consistent with FAA Order 1050.1G, Signature and the Port Authority evaluated the reasonably foreseeable environmental effects of the Proposed Action, the action alternatives, and the No Action Alternative. FAA Order 1050.1G does not identify environmental justice as a separate environmental impact category for analysis. Accordingly, this topic was not evaluated as a standalone resource category in this EA. Instead, the EA evaluates the environmental resource categories identified in FAA Order 1050.1G, including air quality, noise and noise-compatible land use, water resources, biological resources, and other applicable resources. As documented in Section 4 of the EA, the Proposed Action would not result in significant impacts to these resource categories.

The Proposed Action would not increase the Airport's operational capacity, change runway configurations, alter aircraft flight tracks, or increase the number of aircraft operations. In fact, by increasing on-airport aircraft parking capacity, the Proposed Action is expected to reduce the need for aircraft ferry flights, resulting in approximately 2.6 percent fewer total airport operations and approximately 3.4 percent fewer Signature operations compared to the No Action Alternative.

The suggestion that aircraft activity should be accommodated at another airport was considered as part of the alternatives analysis. As documented in Section 3 of the EA, off-airport alternatives were evaluated and determined not to be practical or feasible because they would not meet the purpose and need for the Proposed Action, which is to better accommodate both existing and forecasted demand at TEB Signature East and Signature South leaseholds while enhancing the safety and efficiency of aircraft operations related to aircraft parking.

PC060-5

Comment:

The purpose is to accommodate larger jet aircraft due to modern design of the winglets. Building Fixed Based Operations (FBO) that provides new habitable buildings that serves private jet travelers does not need to be incorporated if the expansion is to accommodate the larger wings. Therefore, the expansion alternatives should address expanding the aircraft parking and hanger facilities only in order to reduce the impact to the ecological community proposed to be impacted by the redevelopment. Same situation with parking. If the purpose is to accommodate the larger jet aircraft due to modern design of the winglets, then additional automobile parking is not necessary. The alternative analysis should address the expansion of aircraft parking and hanger facility only.

Response:

As described in Section 2.3 of the EA, the Proposed Action includes redevelopment of the Signature East and Signature South leaseholds through the construction of new aircraft aprons, hangars, terminal facilities, and associated support infrastructure on existing Airport property. The Proposed Action is needed to address existing operational deficiencies that cannot be resolved under existing conditions. The Proposed Action would improve aircraft circulation and operational efficiency while continuing to accommodate existing and forecast demand at TEB.

The proposed terminal, hangar, maintenance, and support buildings would provide the operational, administrative, maintenance, passenger processing, and crew support functions necessary to support aircraft operations at Signature East and Signature South. These facilities are typically co-located with aircraft hangars and apron areas, consistent with airport planning and design guidance, including FAA AC 150/5300-13B, and ACRP Report 113. Accordingly, these facilities are integral components of the overall redevelopment and are not independent projects or amenities unrelated to the purpose and need for the Proposed Action.

A description of the Purpose and Need for the Proposed Action is provided in Section 2 of the EA. The Proposed Action includes projects at both Signature East and Signature South, which are treated as a single project in the EA. 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 (see Section 2.2.1 of EA).
- The modern 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 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, which has resulted in unnecessary 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 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 (see Section 2.2.4 of EA).

PC060-6

Comment:

Section 3.3.2 indicates that there is no mechanism to force customers to use other modes of transportation or to relocate aircraft and thus not expanding TEB would be noncompliant with Federal Law. This is a misleading conclusion because ultimately travelers will use alternate modes of transition to exit the airport. It is not unreasonable to expect the wealthy private jet users to add an additional ½ to one hour drive to their destination.

Response:

Section 3.3 of the EA evaluates a range of reasonable alternatives to the Proposed Action in accordance with FAA Orders 1050.1G and 5050.4B, including the No Action Alternative, the use of other airports, and the use of other modes of transportation. These alternatives were evaluated to determine whether they would satisfy the Purpose and Need for the Proposed Action.

As described in Section 3.3.2 of the EA, the Use of Other Airports Alternative was not carried forward because it would not satisfy the Purpose and Need for the Proposed Action. TEB serves as the region's primary airport for general aviation access to New York City, and users select Teterboro because of its proximity, accessibility, and available aviation services. While some individual travelers may choose to use another airport and travel a greater distance by ground transportation, neither Signature nor the FAA has the authority to require aircraft operators or passengers to relocate their operations to another airport. Accordingly, the assumption that users would voluntarily shift to other airports in sufficient numbers to address the identified operational deficiencies at Signature's facilities

is not reasonable. Additionally, because the runways at TEB can accommodate the existing and forecast aircraft operations, the FAA cannot turn away or divert aircraft unless the Airport is at gridlock which means that there is nowhere for the aircraft to go once they land. Because there may not be a place to park, aircraft must then queue on taxiways in order to takeoff and go to another airport to park. This compounds the congestion problems on the ground including at the Signature FBO aprons, creates inefficiencies, additional noise and air emissions, and frequently leads to gridlock conditions. Providing additional parking alleviates the need for ferry flights and the corresponding congestion and inefficiency issues.

Similarly, the Use of Other Modes of Transportation Alternative was evaluated and dismissed because it would not satisfy the Purpose and Need for the Proposed Action. The Proposed Action addresses the redevelopment of existing fixed-base operator facilities at Teterboro Airport to accommodate existing and forecast demand for general aviation services. Substituting other modes of transportation would not address the identified deficiencies in aircraft parking, apron circulation, hangar capacity, or operational efficiency at Signature's existing leaseholds.

The alternatives analysis also evaluated multiple on-airport redevelopment configurations, including different layouts and facility footprints for the Signature East and Signature South leaseholds. As documented in Section 3 and Appendix D of the EA, the selected configuration was determined to be the smallest practicable alternative that satisfies the Purpose and Need for the Proposed Action while minimizing environmental impacts.

PC060-7

Comment:

As part of the pending Individual Flood Hazard Area Permit, NJDEP will confirm that the Proposed Action meets the federal consistency requirements for NJCMP. However, as discussed at the Public Workshop meeting the Flood Hazard Area Application was prepared in accordance with the New Jersey Department of Environmental Protection (NJDEP), Division of Land Resource Protection (DLRP) Flood Hazard Area Control Act Rules at N.J.A.C. 7:13 dated July 17, 2023. As of January 20, 2026, the Climate Adjusted Flood Elevation is four feet higher than FEMA and thus the design should be 8 feet plus 4 feet (NAVD88) or 12 Feet (NAVD88). According to the plans, the buildings elevation is at 10 feet.

Response:

Signature assessed impacts to coastal resources in accordance with FAA Order 1050.1G and the Coastal Zone Management Act of 1972, 16 U.S.C. § 1451-1466. As noted in Section 4.5.1 of the EA, projects within the Hackensack Meadowlands District typically obtain federal coastal consistency through New Jersey's enforceable policies via issuance of a zoning certificate by the NJSEA, as outlined in the 2005 Memorandum of Agreement (MOA) between NJDEP and NJSEA. However, the Airport does not need review from NJSEA. In accordance with the 2005 MOA, NJDEP retains authority to conduct the federal consistency determination review for projects on Port Authority lands. Within the Hackensack Meadowlands District, NJDEP's regulatory authority is limited to activities occurring below the mean high water line. NJDEP confirmed via email dated August 5, 2026, that neither the Proposed Action nor its action alternatives propose work below the mean high water line, thus, no coastal permit is required under the New Jersey Coastal Zone Management rules, and the Proposed Action and its action alternatives are presumed consistent with the New Jersey Coastal Management Program (see Appendix L).

Signature also assessed floodplain impacts in accordance with FAA Order 1050.1G, EO 11988, and U.S. DOT Order 5650.2. The assessment evaluated potential encroachments into FEMA-designated floodplains associated with construction and operation of the Proposed Action and the action alternatives relative to the No Action Alternative. Because the Airport is located within the 100-year floodplain of the Hackensack River, construction of the Proposed Action would constitute a floodplain encroachment and require a Flood Hazard Area Verification and Flood Hazard

Area Individual Permit from NJDEP. Consistent with EO 11988 and DOT Order 5650.2, alternatives to the Proposed Action were evaluated to determine whether a practicable alternative exists that would avoid construction within the floodplain. As documented in Appendix D, no practicable alternative was identified because all on-Airport development sites capable of satisfying the Purpose and Need are located within the floodplain.

With respect to the Climate Adjusted Flood Elevation (CAFE) established under the Resilient Environments and Landscapes (REAL) Rules adopted by NJDEP on January 20, 2026, the Flood Hazard Area permit applications for the Proposed Action were submitted to NJDEP on January 16, 2026, and were deemed administratively and technically complete on April 2, 2026. Accordingly, the applications qualify for review under the legacy provision of the REAL Rules, which allows applications deemed technically complete within 180 days of the rule's effective date to be reviewed under the prior Flood Hazard Area Control Act Rules (N.J.A.C. 7:13, dated July 17, 2023). Therefore, the Climate Adjusted Flood Elevation established under the REAL Rules is not the applicable design standard for the Proposed Action. The building elevations referenced in the EA were designed in accordance with the applicable NJDEP flood hazard area standards in effect at the time of application. NJDEP made a final determination regarding compliance with all applicable flood hazard area requirements as part of the Flood Hazard Area Individual Permit review. NJDEP issued the Flood Hazard Area Verification and Flood Hazard Area Individual Permit on July 16, 2026 (see Appendix R).

As discussed in Section 4.8.3.3 of the EA, both the Signature East and Signature South sites were designed to comply with the New Jersey stormwater quality, quantity, and groundwater recharge standards (N.J.A.C. 7:8). Stormwater management features include a pervious pavement system, a StormTrap® underground detention basin, and multiple Kraken Filter manufactured treatment devices at Signature East, and three StormTrap® underground detention systems, four pervious pavement areas, and multiple Kraken Filter manufactured treatment devices at Signature South. These design measures attenuate and treat stormwater runoff to maintain compliance with applicable state performance standards. Accordingly, the Proposed Action would not result in a significant floodplain encroachment because it would not cause notable adverse impacts to the natural and beneficial values of the floodplain, increase flood hazards or risks to human life, or result in floodplain-related damage substantial in cost or extent. Additionally, fill activities within the project area are not subject to the flood storage displacement limits established under N.J.A.C. 7:13-11.4, as the project area is located within a tidal floodplain where flood elevations are driven by tidal and storm surge conditions rather than local runoff volumes. Therefore, construction and operation of the Proposed Action would not result in a significant impact to floodplains. NJDEP will independently review the hydraulic analyses and stormwater management plans submitted in support of the Flood Hazard Area permit applications and will determine compliance with all applicable requirements of N.J.A.C. 7:13 and 7:8. No construction activities may commence until the required NJDEP permits have been issued. As stated above, NJDEP issued the Flood Hazard Area Verification and Flood Hazard Area Individual Permit on July 16, 2026.

Please also see Topical Response TR-11.

PC060-8

Comment:

Section 4.6.3 Environmental Consequences should include a noise study that is conducted by an independent agency at peak flying times. And then noise estimates for the predicted 260,900 operations forecasted to occur in 18 years because the EA has determined that the Proposed Action would not cause noise sensitive areas exposed to noise at or above DNL 65dBA especially since TEB is surrounded by overburdened communities in which noise is a stressor.

Response:

Signature assessed the impact of the Proposed Action and its action alternatives on noise and noise-compatible land use in accordance with FAA Order 1050.1G. As described in Section 4.7.3.1 of the EA, an aircraft noise analysis was not conducted for the Proposed Action because neither the Proposed Action nor its action alternatives would alter runway configurations, increase the number of aircraft operations, change the types of aircraft using the Airport, or modify aircraft arrival and departure tracks or flight profiles. The additional aircraft parking capacity proposed at the Signature East and Signature South sites is intended to alleviate aircraft parking congestion and to reduce the need for ferry flights. As a result, the Proposed Action is projected to result in approximately 2.6 percent fewer total Airport operations and 3.4 percent fewer Signature operations compared to the No Action Alternative. Accordingly, the Proposed Action would reduce ferry flights and their associated noise. Given that the Proposed Action would not result in changes to aircraft operations or other factors that could increase aircraft noise exposure, it would not have the potential to cause significant noise impacts as defined in FAA Order 1050.1G and in Section 4.7.3.2 of the EA. There are no noise-sensitive land uses located within the General Study Area for the Proposed Action, and existing land uses within the General Study Area are compatible with current aircraft noise exposure levels.

As the owner and operator of TEB, the Port Authority implements a comprehensive aircraft noise management program[38] intended to address aircraft noise in surrounding communities. The program establishes mandatory departure noise limits for each runway and includes an enforcement system for aircraft that exceed the applicable noise thresholds. The program also includes a voluntary restraint on non-essential aircraft operations between the hours of 11:00 p.m. and 6:00 a.m. The Port Authority actively coordinates with affected communities through the TANAAC, which comprises local elected officials and members of the aviation community. TANAAC works with airport management and the FAA to balance community quality-of-life concerns with the continued safe and efficient operation of the Airport.

The Port Authority also prepared NEMs and an NCP for the Airport in accordance with 14 CFR Part 150 to evaluate aircraft noise exposure and address noncompatible land uses. The Port Authority now implements the NCP. As part of the NCP, the Port Authority intends to implement 16 noise abatement measures[39] and may consider implementation of 4 land use measures[40] and all 13 programmatic measures.[41, 42]

PC060-9

Comment:

The surrounding five communities, including Teterboro, have recently undergone Rebuild by Design Meadowlands in which part of the design to mitigate community flooding is to provide storage areas such as parks. TEB contains

[38] Port Authority of New York and New Jersey, *TEB Noise Office*, https://aircraftnoise.panynj.gov/teb-airport-noise-office/ (accessed June 29, 2026)

[39] Noise abatement measures are those that control noise at the source. These measures include airport layout modifications, noise barriers, flight path changes, preferential runway use, and arrival and departure procedures.

[40] Land use measures are intended to reduce the effects of aircraft noise on existing noncompatible land uses located within areas of elevated noise exposure. Such measures may include residential sound insulation, property acquisition, or other strategies designed to improve land use compatibility in areas affected by aircraft noise.

[41] Program management measures are intended to support the implementation, administration, and ongoing evaluation of recommended noise abatement and land use measures. These measures help ensure the effectiveness of the Noise Compatibility Program and facilitate coordination among the Port Authority, the FAA, airport users, and surrounding communities.

[42] 88 Federal Register 2751, *Approval of Teterboro Airport (TEB) Noise Compatibility Program*, January 17, 2023, https://www.federalregister.gov/documents/2023/01/17/2023-00651/approval-of-teterboro-airport-teb-noise-compatibility-program (accessed June 29, 2026).

freshwater wetlands that absorb floodwaters. East Riser Ditch and West Riser Ditch are designed to accept and store floodwaters that back flow into the freshwater wetlands. Wetlands have the ability to store stomwater and floodwaters. A single acre can absorb from 330,000 to over 1.5 million gallons of floodwater which prevents downstream property damage. There is no manufactured treatment device (MTD) designed to replicate the absorption ability of a wetland. Therefore, additional hydrographic studies on the existing wetlands and its absorption capabilities needs to be conducted and MTDs designed to accept not only stomwater from the present onsite facility but also on the proposed onsite facility. A study needs to be conducted as to the ultimate additional floodwaters based on sea level rise anticipated by 2050 levels and not the old FHACAR 2023 rules in which tidal floodwaters have no factor of safety.

The current proposal appears to directly sabotage Rebuild by Design Meadowlands efforts to mitigate floodwaters based on recent scientific studies. Provide an analysis of the altered hydrology of the existing wetlands absorption rate to determine "substantial" (Page 73 would not substantially alter the hydrology necessary to sustain…). Especially since East/West Riser ditches are designed to back flow large quantities of floodwaters onto TEB wetland areas. Filling the wetlands directly sabotages Rebuild by Design Meadowlands.

Response:

The EA evaluated potential impacts to wetlands, stormwater management, and floodplains in accordance with FAA Order 1050.1G, EO 11990, EO 11988, DOT Orders 5660.1A and 5650.2, and N.J.A.C. 7:8. NJDEP, which has regulatory authority over these resources, was consulted throughout preparation of the EA. As documented in Section 4.8 of the EA, the Engineer Reports included in Appendix M demonstrate that the Proposed Action would not increase downstream flood hazards or adversely affect surrounding communities, including those within the Rebuild by Design Meadowlands project area.

The commenter references the flood storage function of the on-site wetlands and the role of the East and West Riser Ditches in conveying tidal backflow during storm events. As documented on page 73 of the EA, the Proposed Action would not substantially alter the hydrology necessary to sustain the affected wetland system or any connected wetlands, nor would it reduce the wetlands' ability to retain floodwaters or storm runoff in a manner that could threaten public health, safety, or welfare. The Proposed Action incorporates engineered stormwater management features, including underground detention systems and pervious pavement, that are designed to attenuate stormwater runoff and maintain compliance with the water quantity standards of N.J.A.C. 7:8. These systems address stormwater quantity management independent of the on-site wetlands. The detailed hydrologic and hydraulic modeling supporting these conclusions is documented in Appendix M of the EA.

With respect to the Rebuild by Design (RBD) Meadowlands program, the Proposed Action and the RBD Meadowlands project address different components of regional flood risk. The RBD Meadowlands project focuses on community-level flood protection infrastructure, including pump stations and channel improvements to the East Riser Ditch, while the Proposed Action addresses stormwater management within the Airport boundary through engineered detention and treatment systems. In addition, the Proposed Action's stormwater management design ensures that post-development runoff is controlled to rates at or below pre-development conditions and, therefore, would not increase flood volumes conveyed to the East or West Riser Ditches or to the broader drainage system. Accordingly, while the Proposed Action and the RBD Meadowlands project utilize different approaches, both share the objective of reducing flood risks and improving flood resilience for surrounding communities. Based on the analyses documented in the EA, the Proposed Action is consistent with those objectives and would not adversely affect the flood mitigation benefits of the Rebuild by Design Meadowlands program.

Regarding the commenter's reference to sea level rise, please see Response PC60-7, which addresses the applicability of the NJDEP's REAL CAFE standards. It is also noted that MTDs referenced by the commenter are

designed for water quality treatment (i.e., removal of total suspended solids), not for flood storage or stormwater quantity management. Flood storage and runoff attenuation are addressed separately through the underground detention systems and stormwater management design documented in Appendix M of the EA.

PC086 KIERAS, CONRAD

PC086-1

Comment:

Introduction and Purpose of These Comments

This memorandum represents an inquiry presenting technical issues and requests for information regarding the adequacy of the Draft Environmental Assessment (Draft EA) for the Teterboro Airport (TEB) Facilities Redevelopment Project. The memo has been drafted by a resident of Little Ferry NJ (a neighborhood adjacent to Teterboro Airport) with the expressed goal of submission to the Port Authority, the FAA, and the engineering and environmental consultants working on the project. Contained within this memo are specific observed deficiencies in the disclosed record that impact meaningful technical review and that are inconsistent with the requirements of the National Environmental Policy Act (NEPA) for a Finding of No Significant Impact (FONSI). Issues and requests are organized by technical discipline below.

Response:

The EA was prepared in accordance with NEPA, FAA Order 1050.1G, FAA Order 5050.4B, and other applicable federal requirements. As documented in Section 4 of the EA, the FAA evaluated the environmental consequences of the Proposed Action, the No Action Alternative, and reasonable alternatives across the applicable environmental impact categories. The EA provides the information necessary for the FAA to determine whether the Proposed Action would result in significant environmental impacts and whether preparation of an EIS is required under NEPA. Based on the analyses presented in the EA, the Proposed Action would not result in significant impacts for any of the applicable environmental resource categories. The FAA will make a decision on the EA after reviewing comments received on the Draft EA, responding to comments received, and making any revisions to the EA, as appropriate.

PC086-2

Comment:

Project Background and Understanding

The Proposed Construction, as presented in the Draft EA, would further develop the fixed-base operator (FBO) facilities at two Signature Aviation leaseholds (Signature East and Signature South) within the TEB property boundary. This potential project includes a new apron, a hangar, and terminal facilities. Beyond new construction, said development would also require placement of fill within the 100-year tidal floodplain and fill of jurisdictional wetlands within the Hackensack Meadowlands.

The project site is located within Bergen County, New Jersey, which has been designated serious nonattainment for the 2015 8-hour ozone standard and severe nonattainment for the 2008 8-hour ozone standard. Several residential areas are located to the southwest and southeast of the airport, including the closest, Teterboro Technical High school. The existing DNL 65 dBA noise contour encompasses approximately 196 dwelling units and noise-sensitive sites.

The Draft EA, dated May 2026, was released for public comment, however without the appendices containing the supporting analyses and calculations on which its central conclusions depend. These non-supplied appendices are summarized in Table 1.

Table 1: Technical Appendices Referenced in the Draft EA but Not Released for Public Comment

APPENDIX	TITLE	TECHNICAL CONCLUSIONS DEPENDENT ON THIS APPENDIX
A	Updated Aviation Activity Forecasts	Operations forecast, fleet-mix shift, ferry-flight analysis (4,333 → 6,730), air quality and noise conclusions
B	Demand/Capacity and Facility Requirements	Derivation of facility deficits defining purpose and need
C	Apron Safety Evaluations	"29 percent fewer aircraft" and congestion claims underlying purpose and need
D	Alternatives Details	Alternatives screening and selection
F	Air Quality Technical Report	Emissions methodology, assumptions, habitat and Phase I survey for protected species
G	Regulatory Settings	Regulatory framework underlying permit conclusions
H	Bioloigcal Resources	Protected species findings
J	Wetland Delineation	Jurisdictional wetland boundaries and acreage
K	Clean Water Act Section 404(b)(1) Analysis	Alternatives-to-avoid analysis justifying every acre of wetland fill
L	NJDEP Green Infrastructure Memorandum	Basis for hardship waiver from N.J.A.C. 7:8 green-infrastructure standards
M	Engineering Reports	Stormwater and hydraulic design: tailwater assumptions, detention sizing, pervious-pavement and underdrain design; basis for "no impact on flooding in surrounding communities" conclusion

Response:

The Draft EA for the Proposed Action, including all technical appendices, was made available for public review on the Port Authority's website during the 31-day public comment period from May 29, 2026, through 5:00 p.m. Eastern Time on June 29, 2026. Due to file size, separate links for the main body of the Draft EA and the appendices were provided on the Port Authority website. The NOA announcing the availability of the Draft EA and the beginning of the public review period was published on May 29, 2026, in The Star-Ledger, The Herald News, and northjersey.com. In addition, notices announcing the availability of the Draft EA and its appendices were distributed electronically to interested agencies, organizations, and individuals. A physical copy of the Draft EA and appendices were available to the public for review at the TEB Manager's Office, and at the Bergen County Clerk's Office during the comment period, as stated in the NOA.

The comment states that the appendices supporting the Draft EA were not released for public review. However, the Draft EA appendices were made available throughout the public comment period together with the Draft EA. The table included in the comment also does not identify the complete set of appendices included with the Draft EA. A complete list of the appendices is provided in the Table of Contents of the EA, and Appendix P documents the public availability of the Draft EA and its supporting appendices.

PC086-3

Comment:

Technical Issues and Requests

Issue 1 — Withheld Appendices Prevent Technical Review

The Draft EA repeatedly makes reference too and directs the reviewer to appendices for the substantive technical analysis supporting its findings. Those appendices were not in the commonly accessible Draft EA document published for public review. As a result, the public is asked to trust conclusions made using analysis and supporting documentation on faith alone. The withheld appendices are identified in Table 1 above.

A comment period during which the supporting technical analysis is withheld does not constitute meaningful public review. The public cannot make proper judgements on data it has not been permitted to see, and the FAA cannot reasonably conclude that public concerns were addressed when the public was structurally prevented from raising informed technical objections.

Request: Release the complete appendices (A through O) to the public and reopen or extend the comment period for no less than 30 days following their release. The FAA should not issue a FONSI until this has occurred.

Response:

Please see Response PC086-1 and PC086-2. The request to release the appendices and reopen or extend the public comment period is based on an incorrect premise that the appendices were unavailable during the public review period.

PC086-4

Comment:

Issue 2 — Public-Trust Obligations Invoked Selectively to Justify Expansion but Not to Weigh Public Environmental Costs

The Draft EA defines purpose and need around accommodating existing flight usages and forecast demand at two private FBO leaseholds. The federal action is the FAA's approval of an Airport Layout Plan update for a publicly owned airport, advanced under the sponsorship of the Port Authority, a public entity that holds TEB in trust for the region.

The Draft EA consistently invokes Grant Assurance 22 (economic nondiscrimination) to explain why the Port Authority cannot turn aircraft away or compel use of other modes or airports. That obligation is used throughout the document as a reason the project must proceed. This same public-trust framing is not applied consistently to the average residents in the surrounding areas adjacent to the airport. There will be a public cost to filling wetlands in the Hackensack Meadowlands, i.e. developing concrete infrastructure within a tidal 100-year floodplain, and expanding aviation infrastructure in a severe/serious ozone nonattainment area. The record invokes the public character of the airport selectively: to justify accommodation, not to justify restraint or to weigh private benefit against public environmental cost.

Request: Supplement the record to explain how the public-trust character of the Port Authority and the federal interest in the ALP were weighed against the public environmental costs of the action, and to address whether demand-management or restraint options were considered as part of the FAA's and Port Authority's public obligations — not solely as constraints on the sponsor's objectives.

Response:

As the federal agency responsible for ensuring the safe and efficient use of the National Airspace System, the FAA reviews proposed airport development projects to determine whether they are consistent with applicable aviation planning, design, safety, and environmental requirements. Consistent with these responsibilities and the

requirements of NEPA, FAA Order 1050.1G, and FAA Order 5050.4B, the Purpose and Need for the Proposed Action was developed to address identified operational deficiencies while satisfying the FAA's statutory obligations and environmental review requirements.

Consistent with NEPA, the EA evaluates the reasonably foreseeable environmental effects of the Proposed Action, the No Action Alternative, and reasonable alternatives. As documented in Section 3 and Appendix D, the alternatives analysis considered the No Action Alternative, use of other airports, use of other modes of transportation, other on-airport development locations, and multiple redevelopment configurations for the Signature East and Signature South leaseholds. Alternatives that would avoid development were determined not to satisfy the Purpose and Need for the Proposed Action, while multiple on-airport configurations were evaluated to avoid and minimize environmental impacts, particularly impacts to wetlands. As documented in Appendix K, the selected configuration represents the smallest practicable development footprint that satisfies the Purpose and Need while minimizing wetland impacts to the maximum extent practicable. Since publication of the Draft EA, the footprint of the Proposed Action has been further reduced to decrease wetland impacts from 11.0 acres to 10.9 acres.

The EA also considered alternatives that would effectively manage or reduce demand, including the No Action Alternative, the use of other airports, and the use of other modes of transportation. These alternatives were not carried forward because they would not satisfy the Purpose and Need for the Proposed Action. In addition, under 49 U.S.C. § 47107(a) and the associated FAA Airport Sponsor Grant Assurances, the Port Authority, as the airport sponsor, is responsible for operating and maintaining Teterboro Airport as a public-use airport in accordance with the approved ALP and ACM. As a public-use airport, TEB must be available to aeronautical users on reasonable and nondiscriminatory terms. However, the undertaking of these responsibilities by the Port Authority, as well as by other sponsors of public-use airports, does not constitute a "public trust." The FAA classifies Teterboro Airport as a national, non-primary reliever airport that serves general aviation activity and helps relieve congestion at the region's commercial service airports. Teterboro Airport is not certificated to provide scheduled commercial airline service, and the Proposed Action would not change the Airport's role or FAA classification.

As described in Section 4 of the EA, the environmental consequences of the Proposed Action, the No Action Alternative, and the reasonable alternatives were evaluated in accordance with NEPA and FAA Order 1050.1G. The analysis considered the reasonably foreseeable environmental effects of each alternative, including the type, context, intensity, and duration of potential impacts. Consistent with FAA Order 1050.1G, the EA evaluated the applicable environmental impact categories and, as appropriate for the Proposed Action, considered short- and long-term effects, beneficial and adverse effects, and potential effects on economic conditions and quality of life.

The EA concludes that the Proposed Action would not result in significant environmental impacts to any of the applicable environmental resource categories when compared to the No Action Alternative. The Proposed Action also incorporates measures to avoid and minimize impacts to wetlands, comply with applicable New Jersey stormwater management requirements, and compensate for unavoidable wetland impacts through off-site mitigation. Accordingly, the EA does not support the conclusion that implementation of the Proposed Action would result in the significant environmental effects described in the comment.

PC086-5

Comment:

Issue 3 — Induced Demand: "No Increase in Operations" Premise Is Internally Inconsistent and Unsupported by Disclosed Analysis

The Draft EA's air quality and noise conclusions both rest on a single premise: that the Proposed Action will not increase the number of aircraft operations, change the fleet mix, or alter routes relative to the No Action Alternative, and will in fact reduce operations by eliminating ferry flights. On that basis the EA claims approximately 2.6 percent

fewer total airport operations and 3.4 percent fewer Signature operations than No Action, and concludes that no noise analysis is necessary.

This premise is a clear discontinuity with the expansions stated purpose and need. The Draft EA documents that demand already exceeds capacity; the facilities already turn aircraft away. Signature hangers had closed its aprons for approximately 180 hours over 59 closures in 2024 alone, and 375 times over 2014–2024; and that ferry flights occur because parking is unavailable. It is clear to any reasonable introspection that resolving the perceived capacity constraint can be reasonably expected attract or, at the very least, resolve current lacking that would otherwise have been accommodated elsewhere. The Draft EA cannot simultaneously rely on acute, documented capacity shortfalls to establish need and assume those shortfalls have no effect on the number of operations the expanded facility will accommodate.

The disclosed record contains no sensitivity analysis testing how conclusions change if added capacity retains even a modest fraction more operations than the No Action baseline assumes. The supporting forecast and ferry-flight analysis are in the withheld Appendix A.

Request: Disclose Appendix A and provide a quantified sensitivity analysis showing how air quality, noise, and ferry-flight conclusions change under scenarios in which expanded capacity retains or induces 5 percent, 10 percent, and 15 percent more operations than the No Action baseline. If no such analysis was performed, the record should so state, and the "no increase in operations" premise should be identified as an unsupported assumption rather than a finding.

Response:

Please see Response PC086-2. The Draft EA, including Appendix A and the other supporting technical appendices, was made available throughout the public comment period.

As described in Section 2.3 of the EA, the Proposed Action consists of redevelopment of the existing Signature East and Signature South leaseholds through construction of aircraft aprons, hangars, terminal facilities, and associated support infrastructure on existing Airport property. The Proposed Action would not expand Airport property, add runways or taxiways, increase the Airport's operational capacity, or authorize additional aircraft operations. Rather, it would improve aircraft parking, circulation, and operational efficiency while accommodating existing and forecast demand within Signature's existing leaseholds. The forecasted increase in aircraft operations is independent of the Proposed Action and reflects anticipated regional demand for general aviation activity over the 20-year planning period. Signature prepared an FAA-approved aviation activity forecast documenting projected aircraft operations at Teterboro Airport and activity specific to Signature's facilities (see Section 1.2.2 and Appendix A of the EA). The Proposed Action was developed in response to that forecasted demand; it does not create or induce the demand.

The environmental analyses compare the Proposed Action and the No Action Alternative using the same FAA-approved forecast of future aircraft activity. Accordingly, both alternatives assume the same forecast number and mix of aircraft operations. The difference between the alternatives is how those forecast operations are accommodated. Under the No Action Alternative, limited aircraft parking capacity at Signature's facilities would continue to result in apron congestion, temporary apron closures, and unnecessary ferry flights when aircraft cannot be parked at Teterboro Airport. Under the Proposed Action, the same forecast demand would be accommodated more efficiently through additional aircraft parking and improved apron circulation. As a result, the Proposed Action is projected to result in approximately 2.6 percent fewer total airport operations and approximately 3.4 percent fewer Signature operations than the No Action Alternative because unnecessary ferry flights would be reduced.

Signature evaluated the potential effects of the Proposed Action on noise and noise-compatible land use in accordance with FAA Order 1050.1G. As described in Section 4.7.3.1 of the EA, a detailed aircraft noise analysis was

not necessary for the Proposed Action as it would not alter runway configurations, increase the number of aircraft operations, change the types of aircraft using the Airport, or modify aircraft arrival and departure tracks or flight profiles when compared to the No Action Alternative. Because the Proposed Action would not increase forecast aircraft operations, change the forecast fleet mix, alter runway configurations, or modify aircraft arrival and departure tracks or flight profiles relative to the No Action Alternative, it would not have the potential to cause significant noise impacts as defined in FAA Order 1050.1G.

The EA evaluates the Proposed Action using the FAA-approved aviation activity forecast and compares the environmental effects of the Proposed Action and the No Action Alternative under that forecast. NEPA requires the evaluation of reasonably foreseeable environmental effects, not speculative or remote scenarios. Because the Proposed Action is not forecast to induce additional aircraft operations beyond those included in the FAA-approved forecast, the requested sensitivity analyses assuming induced operations of 5 percent, 10 percent, or 15 percent above the No Action baseline represent speculative scenarios and were not prepared. The environmental analyses documented in the EA are based on the FAA-approved forecast, which represents the best available projection of future aviation activity at Teterboro Airport. Fundamentally, if the Proposed Action is not implemented, the Signature facilities will experience increased congestion and periods of time when no additional aircraft can be accommodated at the Signature FBOs, which will result in more ferry flights, noise, and air quality emissions.

PC086-6

Comment:

Issue 4 — Noise: Annual-Average Threshold Does Not Capture Impacts of Fleet-Mix Shift Toward Larger Jets

The Draft EA declines to perform aircraft noise analysis on the basis that operations and routes do not change versus No Action and that the DNL 1.5 dBA significance threshold is not implicated. The EA concedes that DNL is an annual-average metric and that noise on any given day or at night may be substantially higher than the annual average. The existing DNL 65 dBA contour already encompasses approximately 196 dwelling units and noise-sensitive sites, with residential areas to the southwest and southeast. The EA expressly forecasts a fleet shift toward larger and medium jets at higher growth rates than other aircraft categories. A shift toward larger aircraft can change the acoustic environment at nearby receptors — particularly single-event and nighttime noise levels — even where an annual average contour is not redrawn. The minimum-threshold analysis the EA employs does not address this condition.

Request: Provide supplemental noise disclosure using metrics that reflect actual receptor experience: nighttime (10 PM–7 AM) operations counts, Sound Exposure Level (SEL) for representative large-jet events, and Number-Above analyses (e.g., N65, N75), with particular attention to how the forecast fleet shift toward larger jets affects single-event and nighttime noise levels at residential receptors already within the DNL 65 dBA contour.

Response:

Please see Response PC086-5. Signature assessed the impacts of the Proposed Action and its action alternatives on noise and noise-compatible land use in accordance with FAA Order 1050.1G. As described in Section 4.7.3.1 of the EA, a detailed aircraft noise analysis was not conducted because neither the Proposed Action nor its action alternatives would alter runway configurations, increase the number of aircraft operations, change the types of aircraft using the Airport, or modify aircraft arrival and departure tracks or flight profiles relative to the No Action Alternative. The fleet-mix shift toward larger jet aircraft identified in the FAA-approved forecast (Section 1.2.2 of the EA) is projected to occur regardless of whether the Proposed Action is implemented; the same forecast fleet mix applies to both the Proposed Action and the No Action Alternative. Accordingly, any change in the acoustic environment attributable to fleet-mix trends is not an effect of the Proposed Action and does not constitute a basis for requiring a detailed noise analysis under FAA Order 1050.1G.

Consistent with FAA Order 1050.1G, Day-Night Average Sound Level (DNL) is the FAA's primary metric for evaluating aircraft noise exposure and determining the significance of aircraft noise impacts under NEPA. While supplemental noise metrics may be used to provide additional information regarding aircraft noise, they are not used to determine the significance of aviation noise impacts. Because the Proposed Action would not alter runway configurations, increase the number of aircraft operations, change the types of aircraft using the Airport, or modify aircraft arrival and departure tracks or flight profiles when compared to the No Action Alternative, a detailed aircraft noise analysis and evaluation of supplemental noise metrics were not necessary.

As the owner and operator of Teterboro Airport, the Port Authority implements a comprehensive aircraft noise management program intended to reduce aircraft noise in surrounding communities. The program establishes mandatory departure noise limits for each runway and includes an enforcement program for aircraft that exceed the applicable noise thresholds. The program also includes a voluntary restraint on non-essential aircraft operations between the hours of 11:00 p.m. and 6:00 a.m. The Port Authority also coordinates with surrounding communities through the TANAAC, which includes local elected officials and representatives of the aviation community.

In addition, the Port Authority prepared NEMs and an NCP in accordance with 14 CFR Part 150 to evaluate aircraft noise exposure and identify measures to reduce aircraft noise impacts and improve land use compatibility. The Port Authority now implements the NCP. Under the Part 150 airport noise compatibility planning program, 14 CFR § 150.9(b) establishes DNL as the system for determining noise exposure to individuals from airport operations. The FAA approved the NCP, which includes 16 noise abatement measures, four land use measures, and 13 programmatic measures.[43, 44]

PC086-7

Comment:

Issue 5 — Air Quality: Operational Emissions Assessed Only Qualitatively in a Severe/Serious Nonattainment Area

Bergen County is designated serious nonattainment for the 2015 8-hour ozone standard and severe nonattainment for the 2008 8-hour ozone standard. The Draft EA quantifies construction emissions and shows them below de minimis thresholds using the largest project footprint, which is appropriately conservative. Operational emissions are assessed only qualitatively, resting on the claim that the Proposed Action reduces ferry flights and therefore reduces emissions relative to No Action.

That conclusion is entirely contingent on the ferry-flight differential in the withheld Appendix A and on the unexamined induced-demand assumption described in Issue 3. If the retained-demand assumption is incorrect, the direction of the operational air quality conclusion could reverse. In a nonattainment area of this severity, a qualitative assertion is an insufficient basis for a determination that no General Conformity determination is warranted.

Request: Quantify operational emissions of ozone precursors (NOX and VOC) under the No Action and Proposed Action alternatives, including the induced and retained-demand sensitivity scenarios described in Issue 3. Disclose Appendix F so the emissions methodology and assumptions can be evaluated before any conformity conclusion is finalized.

---

[43] Program management measures are intended to support the implementation, administration, and ongoing evaluation of recommended noise abatement and land use measures. These measures help ensure the effectiveness of the Noise Compatibility Program and facilitate coordination among the Port Authority, the FAA, airport users, and surrounding communities.

[44] Federal Aviation Administration, *Teterboro Airport 14 CFR Part 150 Study-Noise Compatibility Program Record of Approval,* January 11, 2003. https://www.panynj.gov/content/dam/port-authority/aircraft-noise/TEB-FAA-NCP-Record-of-Approval(ROA).pdf (accessed June 29, 2026).

Response:

Please see Response PC086-2. The Draft EA, including Appendix A and the other supporting technical appendices, was made available throughout the public comment period.

Signature assessed the impacts of the Proposed Action and its action alternatives on air quality in accordance with FAA Order 1050.1G, Section 176(c) of the CAA, and 40 CFR Part 93. As documented in Section 4.3 of the EA, construction emissions were quantitatively evaluated using the largest development footprint considered during the alternatives analysis to conservatively assess potential emissions. The estimated construction emissions for all criteria pollutants remained below the applicable General Conformity *de minimis* thresholds.

The operational air quality analysis compared the Proposed Action and the No Action Alternative using the same FAA-approved aviation activity forecast described in Section 1.2.2 and Appendix A. Accordingly, both alternatives assume the same forecast number and mix of aircraft operations. The difference between the alternatives is how those forecast operations are accommodated. Under the No Action Alternative, limited aircraft parking capacity at Signature's facilities would continue to result in unnecessary ferry flights. Under the Proposed Action, additional aircraft parking would reduce the need for these ferry flights while accommodating the same forecast aviation demand. As a result, the Proposed Action is expected to reduce aircraft ferry flights and associated aircraft operations relative to the No Action Alternative and, therefore, is not expected to increase operational aircraft emissions. Accordingly, the Proposed Action would not result in operational emissions that would trigger a General Conformity determination under 40 CFR Part 93. For the same reasons discussed in Response PC086-5, the requested sensitivity analyses assuming induced operations above the FAA-approved forecast baseline represent speculative scenarios and were not prepared.

Therefore, the Proposed Action would not cause or contribute to an exceedance of the NAAQS, would not exceed the applicable General Conformity *de minimis* thresholds, and would not result in significant air quality impacts under FAA Order 1050.1G.

PC086-8

Comment:

Issue 6 — Wetlands: Off-Site Mitigation Represents a Real Local Loss of Meadowlands Function; Key Mitigation Is Not Yet Enforceable

The Proposed Action would fill jurisdictional wetlands within the Hackensack Meadowlands, requiring 11.00 credits of compensatory mitigation across freshwater emergent, forested/shrub, and managed-wetland categories. Compensatory mitigation may be legally available, but it does not eliminate the local loss of wetland acreage and function. The current mitigation banks as identified are: Kane, Evergreen MRI-3, and the GreenVest F. Guarini Tract. All of these banks are located miles away in different municipalities alongside the Hackensack corridor, and are not in the immediate airport vicinity where the wetland function is lost.

Furthermore, a substantial share of the proposed mitigation is not yet enforceable. The Draft EA states that the GreenVest F. Guarini Tract — designated to absorb 3.43 credits of palustrine forested wetland impact — is "adjacent to, but outside" the area for which GreenVest is seeking bank approval, and that GreenVest "will secure" the required permits and approvals. That is a commitment to obtain future authorization, not authorization in hand. The 404(b)(1) alternatives-to-avoid analysis that purports to justify the fill is in the withheld Appendix K.

Request: Disclose Appendix K and document, before any FONSI, the finalized status of every mitigation instrument relied upon — including bank approval, credit service area, and specific approvals still outstanding for the GreenVest

F. Guarini Tract — together with long-term stewardship and financial-assurance obligations. Mitigation contingent on future approvals should not support a no-significant-impact finding.

Response:

Please see Response PC086-2. The Draft EA, including Appendix K (Section 404(b)(1) Alternatives Analysis) and all other supporting technical appendices, was made available throughout the public comment period.

The Proposed Action would directly impact approximately 10.9 acres of wetlands located within the highly developed environment of Teterboro Airport. These wetlands occur within an active airport setting and are managed in accordance with the FAA-approved WHMP, prepared pursuant to FAA AC 150/5200-33C, to reduce wildlife hazards to aircraft operations.

The wetlands proposed for impact vary in their ecological quality or function. As described in Section 4.8.3.3 of the EA, the affected wetlands are generally fragmented, dominated by non-native invasive species such as *Phragmites australis*, and have been altered by historical grading, vegetation management, adjacent airport operations, and other disturbances. The forested wetlands are routinely topped or trimmed to maintain compliance with FAA safety requirements, including protection of air navigation surfaces and air traffic control line-of-sight. Accordingly, the functions and values of these wetlands are reduced relative to higher-quality wetlands within the Hackensack Meadowlands.

The commenter is correct that compensatory mitigation does not preserve the existing wetlands at the project site. Rather, compensatory mitigation is intended to offset unavoidable wetland impacts after avoidance and minimization have been satisfied, consistent with the Clean Water Act Section 404(b)(1) Guidelines, Executive Order 11990, DOT Order 5660.1A, and FAA Order 1050.1G. As documented in Appendix K, Signature first evaluated practicable alternatives to avoid and minimize wetland impacts. Among the practicable alternatives, the selected configuration represents the smallest practicable development footprint that satisfies the Purpose and Need while minimizing impacts to wetlands. Since publication of the Draft EA, the footprint of the Proposed Action has been further reduced, further decreasing wetland impacts.

The compensatory mitigation would be provided through the purchase of credits from approved wetland mitigation banks located within the same watershed as the impacted wetlands. On-site wetland mitigation is not feasible at TEB, as there are no suitable sites on Airport property and FAA does not permit wetland mitigation within close proximity to runways or aircraft movement areas due to wildlife hazard concerns (see FAA AC 150/5200-33C). Although the identified mitigation bank sites are not adjacent to the Airport, watershed-based mitigation is consistent with the federal compensatory mitigation regulations (33 CFR Part 332), which establish a preference for the use of approved mitigation banks because they provide restored, enhanced, established, or preserved wetlands that are subject to long-term management, financial assurances, and perpetual protection. As described in Section 4.8.3.3 of the EA, the mitigation sites are anticipated to provide wetland functions and values that exceed those of the wetlands proposed to be impacted. With respect to the GreenVest F. Guarini Tract, the EA discloses that GreenVest is currently seeking wetland mitigation bank approval, and that GreenVest will secure all required local, state, and federal permits and approvals to perform mitigation at the site. GreenVest is in the process of obtaining final signatures from the USACE and NJDEP regarding the Upper Penhorn Creek Mitigation Bank's approval. The approval status and credit availability of all mitigation bank sites, including the GreenVest F. Guarini Tract, are evaluated by USACE as part of its Section 404 permit review. It is anticipated that a Section 404 permit issued by the USACE would include compensatory mitigation requirements and stipulations stating that construction cannot commence until an approved mitigation plan is in place. Please also see TR-12 for more information.

PC086-9

Comment:

Issue 7 — Floodplain and Fill: "No Flooding Impact on Surrounding Communities" Conclusion Rests on Withheld Hydraulic Analysis

The Draft EA discloses the following conditions at the Signature South site: 8.82 acres of proposed development and 8.40 acres of new impervious surface within the 100-year tidal floodplain; up to approximately 71,500 cubic yards of fill required during construction; inability to fully meet the green-infrastructure standards of N.J.A.C. 7:8, requiring a hardship waiver; and East and West Riser ditches designed to backflow brackish floodwaters onto airport property during 100-year and storm-surge events, with the Signature East site completely inundated during the 100-year event.

Against those disclosed conditions, the EA concludes that the additional impervious surface "would have no impact on flooding in the surrounding communities." That conclusion depends entirely on the hydraulic and stormwater modeling in the withheld Appendix M — tailwater and tidal boundary conditions, detention sizing, hydraulic grade lines, and pervious-pavement and underdrain design. Fill in this tidal floodplain is noted as exempt from the flood-storage displacement limits of N.J.A.C. 7:13-11.4. The public is therefore asked to accept that tens of thousands of cubic yards of net fill in a tidal floodplain abutting residential areas has no downstream consequence, without access to the supporting analysis and without any compensatory-storage requirement.

Request: Disclose Appendix M in full, including tailwater and tidal boundary assumptions, compensatory-storage analysis or the basis for foregoing it, hydraulic grade lines, and a storm-surge and sea-level-rise sensitivity analysis. Disclose the substance of the requested N.J.A.C. 7:8 hardship waiver (Appendix L) and explain whether any screened-out alternative would have avoided the need for a waiver. The "no impact on surrounding communities" conclusion should not be finalized on a withheld hydraulic model.

Response:

Please see Response PC086-2. The Draft EA, including Appendix M (Engineering Reports), Appendix L (Green Infrastructure Hardship Exception), and all other supporting technical appendices, was made available throughout the public comment period. Accordingly, the conclusion that the Proposed Action would not increase flooding in surrounding communities is based on the Engineering Reports documented in Appendix M of the Final EA.

Signature assessed floodplain impacts in accordance with FAA Order 1050.1G, EO 11988, and DOT Order 5650.2. The assessment evaluated potential encroachments into FEMA-designated floodplains associated with construction and operation of the Proposed Action and the action alternatives relative to the No Action Alternative. Because the Airport is located within the 100-year floodplain of the Hackensack River, construction of the Proposed Action would constitute a floodplain encroachment and require a Flood Hazard Area Verification and Flood Hazard Area Individual Permit from NJDEP. NJDEP issued the Flood Hazard Area Verification and Flood Hazard Area Individual Permit on July 16, 2026 (see Appendix R). Consistent with EO 11988 and DOT Order 5650.2, alternatives to the Proposed Action were evaluated to determine whether a practicable alternative exists that would avoid construction within the floodplain. As documented in Appendix D, no practicable alternative was identified because all on-Airport development sites capable of satisfying the Purpose and Need are located within the floodplain.

With respect to the fill required for site grading, the project sites are located within a tidal flood hazard area, where flood elevations are governed primarily by tidal conditions in the Hackensack River system rather than by local runoff volumes. Accordingly, the NJDEP Flood Hazard Area Control Act Rules exempt tidal flood hazard areas from the flood-storage displacement requirements of N.J.A.C. 7:13-11.4, and compensatory flood storage is not required. Hydrologic and hydraulic analyses documented in Appendix M evaluated the effects of the proposed fill, increased impervious coverage, and post-development runoff and concluded that the Proposed Action can be accommodated by the proposed stormwater management systems and existing receiving infrastructure without increasing downstream flooding or adversely affecting surrounding communities.

As documented in Appendix L of the EA, a Green Infrastructure Hardship Exception was requested in accordance with N.J.A.C. 7:8 because site-specific constraints, including FAA wildlife hazard management requirements under AC 150/5200-33C and high seasonal groundwater elevations, preclude the implementation of green infrastructure best management practices at the project sites. Notwithstanding the hardship exception, both the Signature East and Signature South sites were designed to comply with the New Jersey stormwater quality, quantity, and groundwater recharge standards (N.J.A.C. 7:8). The hardship exception pertains to the specific stormwater management practices used to achieve those standards and does not relieve the project from meeting the applicable performance requirements. The hardship exception therefore does not waive compliance with New Jersey's stormwater runoff quantity, runoff quality, or groundwater recharge standards; rather, it addresses the specific methods used to achieve those standards in light of airport operational and site constraints.

Stormwater management features for both the Signature East and South projects include pervious pavement systems and StormTrap® underground detention basins with pre-treatment via NJDEP certified non-GI Manufactured Treatment Devices. These design measures treat and attenuate stormwater runoff to maintain compliance with applicable state performance standards. Accordingly, neither the Proposed Action nor the action alternatives would result in a significant floodplain encroachment because they would not cause notable adverse impacts to the natural and beneficial values of the floodplain, increase flood hazards or risks to human life, or result in floodplain-related damage substantial in cost or extent. Therefore, construction and operation of the Proposed Action would not result in a significant impact to floodplains. The hydraulic analyses and stormwater management designs documented in Appendix M are subject to independent review and approval by NJDEP through the Flood Hazard Area Individual Permit and stormwater management review processes. No construction within the flood hazard area may proceed until the required NJDEP permits have been issued. As stated above, NJDEP issued the Flood Hazard Area Verification and Flood Hazard Area Individual Permit on July 16, 2026 (see Appendix R).

PC086-10

Comment:

Issue 8 — Stormwater Treatment and Deicing: Maintenance Commitments Are Not Enforceable

The Draft EA states that no new fuel farm or above-ground tanks are proposed, that existing fuel farms will be used, and that deicing will occur on the apron consistent with existing practice under Signature's SPCC Plan. The EA relies on manufactured treatment devices — including CONTECH Kraken filter vaults — and underground detention systems to meet stormwater quality and quantity requirements. The effectiveness of these systems depends on capture, treatment, and sustained long-term maintenance over the life of the facility.

The disclosed record describes the devices but does not commit, in enforceable terms, to how deicing runoff will be captured and treated, who is responsible for inspecting and maintaining the underground systems and treatment devices, at what frequency, or what the consequences are if maintenance lapses. For systems whose performance is not visible until they fail, a maintenance commitment that is not enforceable does not constitute a mitigation measure.

Request: Place into the record an enforceable operations-and-maintenance commitment for all stormwater treatment devices and detention systems, specifying the responsible party, inspection frequency, performance standards, reporting requirements, and deicing-runoff capture and treatment approach. Identify the permit or agreement instrument that makes those obligations binding and auditable.

Response:

Please see Response PC086-9. In accordance with FAA Order 1050.1G, Signature evaluated the Proposed Action's potential impacts to surface water resources within the project area. NJDEP, which holds regulatory authority over

surface water resources in the project area, was consulted throughout preparation of the EA. With respect to deicing operations, the EA documents that aircraft deicing would continue to occur on the apron consistent with current practice under Signature's Spill Prevention, Control, and Countermeasure (SPCC) Plan, which is maintained in accordance with 40 CFR Part 112. Deicing runoff from the apron areas would be directed to the proposed stormwater management system for treatment prior to discharge. Additionally, as noted in Section 4.6.2.3 of the EA, TEB operates under a New Jersey Pollution Discharge Elimination System permit that requires the development and implementation of a Stormwater Management Plan (SWMP). The SWMP addresses the prevention of pollutants and stormwater discharges that are associated with activities classified as industrial, such as maintenance and fuel storage.

The Proposed Action would increase impervious surface within the project area but would not substantially alter existing drainage patterns. Because the net increase in impervious surface exceeds one-quarter acre, the Proposed Action qualifies as a major development under the Stormwater Management Rules, N.J.A.C. 7:8, which requires a stormwater management system designed to remove 80 percent of total suspended solids (TSS) from runoff. The proposed design meets this standard through NJDEP-approved manufactured treatment devices and pervious pavement systems designed in accordance with N.J.A.C. 7:8-5.5(b). Detailed design specifications for these systems are provided in Appendix M of the EA.

Stormwater management reports and associated plans for the Proposed Action were submitted to NJDEP as part of the flood hazard permit applications, as the Proposed Action is required to demonstrate compliance with N.J.A.C. 7:8 for stormwater runoff quantity, water quality treatment, and groundwater recharge, as applicable. Adherence to these permit requirements, together with the designed stormwater drainage systems, would help ensure that stormwater runoff is properly managed and treated in accordance with applicable regulatory standards, thereby reducing the potential risk for adverse water quality impacts. NJDEP issued the Flood Hazard Area Verification, Flood Hazard Area Individual Permit, and Meadowlands District Water Quality Certificate on July 16, 2026 (see Appendix R). The NJDEP permit issued for the Proposed Action establishes enforceable conditions for the long-term operation and maintenance of the stormwater management systems, including the manufactured treatment devices, pervious pavement systems, and underground detention facilities. As required by the Special Conditions of the NJDEP permit, Signature will be required to prepare and implement an operations and maintenance manual that specifies inspection frequencies, performance standards, maintenance procedures, and the responsible party for each stormwater management measure in accordance with N.J.A.C. 7:8-5.8. Compliance with these permit conditions is subject to NJDEP oversight and enforcement. These requirements provide an enforceable mechanism to ensure long-term inspection, maintenance, and operation of the stormwater management systems. Based on this analysis, the Proposed Action would not be expected to result in significant impacts to stormwater runoff quantity or water quality.

PC086-11

Comment:

Issue 9 — Construction Impacts: Quantitative Analysis Not Provided for Nearest Receptors; Cumulative Construction Burden Unexamined

The Proposed Action and its alternatives would disturb up to approximately 22 acres and move tens of thousands of cubic yards of fill over a construction window described as up to 18 months. The construction-noise finding rests on a narrative assertion — that residences are 700 feet from Signature East and 1,200 feet from Signature South behind wooded buffers — with no quantitative construction-noise modeling disclosed.

Response:

As described in Section 4.7 of the EA, there are no noise-sensitive land uses located within the General Study Area for the Proposed Action, and existing land uses within the General Study Area are compatible with current aircraft noise exposure levels.

Construction noise was evaluated in accordance with FAA Order 1050.1G. The Proposed Action would involve temporary construction activities typical of airport redevelopment projects. Construction would occur on existing Airport property and would be temporary in nature, moving throughout the project area as work progresses. The nearest residential areas are located approximately 700 feet from the Signature East site and approximately 1,200 feet from the Signature South site, with intervening airport facilities, vegetation, and other development between the construction areas and surrounding communities. Based on the distance to the nearest sensitive receptors, the temporary nature of construction activities, and the characteristics of the proposed work, a detailed quantitative construction noise analysis is not warranted.

Consistent with NEPA and FAA Order 1050.1G, the EA evaluated the reasonably foreseeable environmental effects of the Proposed Action, the No Action Alternative, and reasonable alternatives. As documented throughout Section 4 of the EA, the analysis considered the reasonably foreseeable effects of other Port Authority projects expected to occur at Teterboro Airport within the next five years where those projects share a reasonably close causal relationship with the Proposed Action. Based on this evaluation, the EA concluded that the Proposed Action would not result in significant environmental impacts, including temporary construction-related impacts, when considered together with these reasonably foreseeable projects.

PC086-12

Comment:

Several adjacent impact categories including socioeconomics, children's health and safety, and visual effects are dismissed with conclusory less than-significant findings.

Response:

As identified in Section 4.2 of the EA, the Proposed Action would not result in significant impacts to Socioeconomics, Children's Environmental Health and Safety Risks, or Visual Effects. The Proposed Action would not require the relocation of residents or businesses, substantially alter access to community services, or result in significant traffic impacts. Construction-related traffic and employment would be temporary and minor. Following construction, the Proposed Action would not increase aircraft operations, change aircraft types, or alter aircraft flight procedures. Although approximately 30 new employees are anticipated, the associated traffic would remain below the New Jersey Department of Transportation's threshold for a significant traffic impact (N.J.A.C. 16:47). The Proposed Action would also not introduce new environmental health or safety risks to children.

The Proposed Action would not substantially alter the visual character of the Airport or surrounding area. Construction activities would be temporary, and the proposed facilities would be similar in scale and appearance to existing airport development. Project lighting would be consistent with existing airport lighting and would not result in substantial glare, light spillover, or visual intrusion. Accordingly, the EA concludes that the Proposed Action would not result in significant impacts to these environmental resource categories.

PC086-13

Comment:

The EA acknowledges four reasonably foreseeable future projects at TEB within five years — taxiway rehabilitation, an aircraft run-up pad, perimeter fencing, and Runway 6 departure EMAS — but sets them aside on the assertion

that they will not occur at the same time or in the same location. No construction schedule is provided to substantiate that assertion, leaving the cumulative construction burden on surrounding communities unexamined.

Response:

Signature and the Port Authority prepared the EA in accordance with Section 102 of NEPA, DOT Order 5610.1D, and FAA Orders 1050.1G and 5050.4B. Consistent with the CEQ memorandum issued on February 19, 2025, the EA evaluates the reasonably foreseeable environmental effects of the Proposed Action, the No Action Alternative, and reasonable alternatives. CEQ finalized the rescission of its regulations on January 8, 2026. Therefore, FAA Order 1050.1G does not require a separate cumulative effects analysis to satisfy NEPA.

As documented in Section 4 of the EA, the environmental analyses considered the reasonably foreseeable effects of the Proposed Action together with other Port Authority projects at Teterboro Airport that are reasonably expected to occur within the next five years. The EA does not evaluate projects outside TEB property or projects anticipated beyond this timeframe because any environmental effects associated with those projects do not have a reasonably close causal relationship to the Proposed Action and would therefore be speculative. Likewise, the EA does not include projects proposed or initiated by parties other than the Port Authority or Signature because implementation of those projects is uncertain and dependent on future approvals, funding, and operational needs.

The Port Authority identified four reasonably foreseeable projects expected to occur within the next five years: (1) Rehabilitation of Various Taxiways and the Hangar 1 Ramp; (2) Installation of an Aircraft Run-up Pad; (3) Airport Perimeter Fencing; and (4) Installation of a Runway 6 Engineered Materials Arresting System (EMAS). Additional information on these projects is provided in Appendix N (Footnotes 38 through 41).

The exact timing and sequencing of these projects have not been finalized and remain dependent on separate planning, design, funding, permitting, and FAA approval processes. Accordingly, detailed construction schedules are not available. However, based on the Port Authority's current planning, these projects would occur in different locations on Airport property and would not be constructed concurrently with the Proposed Action. Nevertheless, the reasonably foreseeable environmental effects of these projects were considered, as appropriate, in the evaluation of each environmental resource presented in Section 4 of the EA. Based on that evaluation, the EA concludes that the Proposed Action would not result in significant environmental impacts.

PC086-14

Comment:

The following information is not disclosed in the record and is of direct relevance to surrounding receptors: truck routes and daily heavy-truck trip counts by municipality; staging areas and construction hours; dust and noise controls beyond generic commitments; the source and screening of imported fill at a site with documented historical contamination nearby; and the destination of demolition and excavation waste.

Request: Provide a construction management and logistics plan for the record, including: quantified haul volumes and daily heavy-truck trip counts; designated truck routes by municipality; staging areas and construction hours; quantitative construction-noise and dust analysis at the nearest receptors; source and screening of imported fill; identification of disposal facilities for demolition and excavation waste; and a combined construction schedule showing temporal and spatial overlap between the Proposed Action and the four future projects.

Response:

Please see Response PC086-2. The Draft EA, including Appendix F and the other supporting technical appendices, was made available throughout the public comment period. Technical assumptions, methodologies, and models used to conduct the air quality analysis are documented in Appendix F of the EA.

As described in Section 4.3.3.3 of the EA, Signature and the Port Authority will comply with all applicable federal, state, and local requirements intended to protect public health and air quality during construction. These measures include obtaining applicable permits for stationary construction equipment (N.J.A.C. 7:27-8.2), complying with New Jersey's three-minute idling limit (N.J.A.C. 7:27-14 and 15), implementing fugitive dust and odor control measures (N.J.A.C. 7:27-5.2), and complying with applicable state inspection requirements. Any imported fill and disposal of demolition or excavation materials would be managed in accordance with applicable federal, state, and local regulatory requirements, including all applicable NJDEP requirements.

Detailed construction management information, including truck routes, staging areas, construction hours, haul volumes, construction schedules, imported fill sources, and waste disposal locations are not available. These will be developed during final design and construction planning. Accordingly, this level of detail is not available at the EA stage and is not required to evaluate the environmental impacts of the Proposed Action under NEPA. As documented in Appendix F, a conservative approach to estimating emissions from construction of the Proposed Action was taken. The analysis accounted for emissions from construction equipment and activities, including haul trucks and construction worker vehicles; paving and asphalt batching; fugitive dust generated by grading, materials handling, and vehicle travel on paved and unpaved roads; and other construction equipment. Equipment usage hours for equipment were estimated based on operating hours from previous projects that are similar in scope. The number of annual round trips and the distances traveled were estimated based on project dimensions and the quantities of construction materials anticipated to be required. A complete list of the equipment evaluated, along with assumptions regarding equipment usage hours and travel distances, is provided in Appendix F.

PC086-15

Comment:

Issue 10 — Cumulative Impact Scope: Exclusion of Regional Aviation Growth Is Not Justified in the Record

The Draft EA limits its cumulative analysis to Port Authority– or Signature-initiated projects on TEB property within a five-year window, excluding regional and longer-term aviation impacts as speculative. The forecast itself describes TEB operations rising from approximately 172,500 in 2024 to 260,900 in 2044 — a substantially larger future aviation footprint that this infrastructure is expressly designed to accommodate. In a corridor already burdened by ozone nonattainment, existing aircraft noise, and dense surrounding land use, the five-year on-airport scope screens out precisely the regional aviation-growth context that surrounding communities experience.

Request: Explain in the record the basis for excluding regional and longer-horizon cumulative aviation impacts, and address why infrastructure expressly sized to accommodate the 2044 forecast should not have its cumulative effects evaluated against that forecast rather than only against a five-year, on-airport window.

Response:

Please see Response PC086-13. FAA Order 1050.1G does not require a separate cumulative effects analysis to satisfy NEPA. With respect to the commenter's observation that the Proposed Action is designed to accommodate the 2044 forecast, the EA evaluates the environmental effects of the Proposed Action using the FAA-approved forecast through 2044 as the basis for comparing the Proposed Action to the No Action Alternative. The same forecast growth in aviation activity is projected to occur regardless of whether the Proposed Action is implemented; accordingly, the Proposed Action does not generate or induce the forecast growth but rather provides facilities to accommodate demand that would exist under either alternative. See also Response PC086-5. The five-year planning window applies to the identification of other reasonably foreseeable projects at TEB, not to the operational evaluation of the Proposed Action itself, which uses the full forecast horizon. The EA does not evaluate projects anticipated beyond this timeframe because any environmental effects associated with those projects do not have a reasonably close causal relationship to the Proposed Action and would therefore be speculative.

PC086-16

Comment:

Summary of Technical Deficiencies and Requests

On the record released for public comment, the reviewer cannot evaluate the forecast driving air quality and noise conclusions (Appendix A), the safety analysis behind the purpose and need (Appendix C), the air quality methodology (Appendix F), the 404(b)(1) justification for every acre of wetland fill (Appendix K), or the hydraulic modeling on which the "no flooding impact" conclusion depends (Appendix M). Several conclusions — "no increase in operations," "no noise analysis necessary," "no impact on surrounding communities" are stated more firmly than the disclosed evidence supports.

The following actions are requested before a FONSI is issued:

- Release the complete appendices (A through O) and reopen or extend the comment period for no less than 30 days following their release.
- Provide the quantified sensitivity, noise, air quality, hydraulic, and construction analyses identified in Issues 3 through 9 above.
- Document the finalized, enforceable status of all wetland mitigation instruments and stormwater-maintenance commitments.
- Decline to issue a FONSI until the public has had a meaningful opportunity to comment on the actual technical basis for the project's conclusions.

If, after that disclosure, significant questions remain regarding wetlands, floodplain encroachment, air quality in a nonattainment area, and induced demand, the appropriate course is preparation of an Environmental Impact Statement.

Response:

Please see Responses PC086-2 through PC086-3 and PC086-5 through PC086-10. As documented in Response PC086-2, the Draft EA appendices were made available throughout the public comment period together with the Draft EA. The technical analyses documented in the EA satisfy the requirements of NEPA, FAA Orders 1050.1G and 5050.4B, and other applicable federal, state, and local standards. The EA evaluates the reasonably foreseeable environmental effects of the Proposed Action across all applicable environmental resource categories and concludes that the Proposed Action would not result in significant environmental impacts. Under NEPA, preparation of an EIS is required when a proposed action may result in significant environmental impacts. Because the EA's analyses did not identify significant environmental impacts, preparation of an EIS is not warranted for the Proposed Action.

PC086-17

Comment:

Related Permitting Proceedings

The federal concerns identified above overlap with separate state and federal permitting processes — the USACE Section 404 permit, the NJDEP Section 401 Water Quality Certification, the Flood Hazard Area Individual Permit, and the coastal consistency determination — each of which carries its own public-review obligations. These comments are submitted for consideration in those proceedings as well.

These comments are submitted for entry into the administrative record for this action. The commenter requests that personal identifying information be withheld from public review to the extent permitted.

Response:

The commenter's request to withhold personal identifying information from public review has been noted. As described in the responses above, the EA evaluates the potential environmental effects of the Proposed Action in accordance with NEPA, FAA Orders 1050.1G and 5050.4B, and other applicable federal, state, and local requirements. The information presented in the EA is intended to inform the FAA's decision-making process regarding the Proposed Action. The FAA only reviews the submitted public comments in regard to the environmental review for its federal action. Comments on other permits should be made directly to the relevant permitting agencies. The FAA does not represent that comments submitted on FAA's actions will be considered by any other agency.

PC136 TSUI, WINNIE

PC136-1

Comment:

To Whom It May Concern:

I attended the recent presentation regarding the proposed Teterboro Airport Expansion Project and left with several significant concerns that I believe warrant further examination before any approvals are granted.

1. **Transparency Regarding "Unnecessary Ferry Flights"**

   Throughout the presentation, project representatives repeatedly cited "unnecessary ferry flights" as a primary justification for the proposed expansion. However, it remains unclear why these operational challenges appear to disproportionately affect Signature Aviation.

   Teterboro Airport serves numerous operators, including Tradewind Aviation, NetJets, Blade, Wheels Up, and others. If ferry flights are truly a systemic issue impacting airport efficiency, congestion, and environmental quality, the public should be provided with data demonstrating how all operators contribute to and are affected by this problem.

   Without transparent analysis, it is difficult to determine whether the proposed expansion addresses a genuine airport-wide need or primarily serves the business interests of a single operator.

Response:

Please see Response PC001-1.

PC136-2

Comment:

2. **Evaluation of Alternative Parking Solutions**

   The proposal calls for approximately 28,700 square feet of additional aircraft parking. Given the scarcity of available land and the environmental sensitivity of the project area, I question whether alternative parking solutions have been adequately evaluated.

   Airports and transportation facilities around the world routinely utilize vertical infrastructure to maximize operational capacity while minimizing land consumption. A two- or three-story parking structure, or other innovative storage solutions, could significantly reduce the footprint required for aircraft storage and related operations.

The public deserves to understand why such alternatives were rejected before additional land is permanently committed to development.

Response:

Please see Response PC001-2.

PC136-3

Comment:

3. Lack of Consideration for Innovative Aviation Infrastructure

Most concerning is the apparent lack of consideration given to modern aviation infrastructure technologies that could reduce or eliminate the need to fill protected wetlands.

During discussions with Signature Aviation representatives, I received no satisfactory explanation as to why proven alternatives were not evaluated. A simple review of existing airport innovations reveals several examples of space-efficient solutions already in operation worldwide.

One example is the Schaetz Aircraft Carousel system at Seletar Airport in Singapore. This technology functions much like a large rotating carousel, moving aircraft between ground and mezzanine levels. The system can accommodate up to 14 aircraft while occupying a significantly smaller footprint than traditional parking arrangements. By utilizing vertical space, it effectively doubles aircraft parking capacity while reducing land consumption, construction materials, and operational costs.

Another example can be found in Shenzhen, China, where innovative vertical aviation infrastructure has been developed to address space limitations. Similar concepts, including stacked aircraft storage and vertiport systems, demonstrate that airports can increase capacity without expanding into environmentally sensitive areas.

While these examples may not be directly applicable to Teterboro in their current form, they illustrate that innovative alternatives exist and deserve serious evaluation before wetlands are disturbed.

Response:

Please see Response PC001-3.

PC136-4

Comment:

4. Concerns About Future Expansion and Larger Aircraft Operations

This proposal also raises broader questions about the future of Teterboro Airport.

If Signature Aviation requires expansion into wetlands today, what assurances do New Jersey residents have that other operators will not seek similar expansions in the future? Will this project establish a precedent for continued encroachment into environmentally sensitive areas?

After reviewing the Facilities Redevelopment Project Draft Environmental Assessment (CEQ ID Number: EAXX-021-12-ARP- 1769096488), it appears there may be an expectation that larger aircraft will increasingly utilize

Teterboro Airport. If that is the case, the public deserves greater transparency regarding longterm operational forecasts, anticipated aircraft size trends, and the cumulative environmental impacts of future growth.

Before this project advances to the next stage, I urge decisionmakers to provide a more comprehensive public analysis of:

- Ferry flight activity across all airport operators
- Alternative space-saving infrastructure options
- The necessity of wetland impacts versus available alternatives
- Long-term growth projections and future expansion plans
- The anticipated role of larger aircraft at Teterboro Airport

These issues deserve full public disclosure and discussion before irreversible environmental impacts are approved.

Response:

Please see Response PC001-4.

PC150 LONGO, PATRICIA

PC150-1

Comment:

Suggestions to resolve the only 2 safety reasons given for the excuse of this environmental destruction of the natural flood sponge:

1. Stated concern is of peoples safety from flocks of birds!!
    a. Remove all invasive fragmites that already should have been removed due to they attract flocks of blackbird—known fact—could and should have already been done for safety of their peoples—not to be used now as a justified reason!!

Response:

The Airport has an FAA-approved Wildlife Hazard Management Plan (WHMP), developed under FAA AC 150/5200-33C, *Hazardous Wildlife Attractants On or Near Airports*, to ensure safety of aeronautical users by minimizing wildlife hazards, including flocking birds, on Airport property. The WHMP includes measures to minimize wildlife attractants and deter flocking birds from Airport property, including the area of the Proposed Action. These measures include habitat modification through the removal and thinning of trees that may serve as bird roost sites, as well as active wildlife management techniques, such as auditory harassment, to discourage birds from utilizing wetland areas on Airport property. Where practicable, the Port Authority manages stands of *Phragmites spp.* and implements targeted wildlife management measures to reduce their attractiveness to hazardous wildlife. Because *Phragmites spp.* is widespread throughout the wetlands surrounding Teterboro Airport, complete eradication is neither practicable nor necessary to maintain aviation safety. Instead, the Port Authority employs an adaptive management approach that combines vegetation management and active wildlife control to minimize wildlife hazards.

PC150-2

Comment:

b. Replace all invasive items with only certified NJ native plants for the butterflies, pollinators + songbird that don't flock. Another issue. Consult BCAS for proper knowledge please. Should have already been addressed! FTS been done!! Not new!! Thank you

Response:

Please see Response PC150-1. The Airport is actively managed in accordance with the FAA-approved WHMP. Vegetation management and active wildlife control measures are routinely implemented within wetland areas on Airport property to minimize wildlife hazards. Complete removal of *Phragmites spp.* from the Airport is not practicable because it is widespread throughout both the Airport and the surrounding wetlands. Furthermore, replacing this species of plant with native vegetation would not be consistent with the FAA-approved WHMP. The WHMP is intended to minimize wildlife attractants on Airport property and promotes vegetation management practices that reduce the availability of food, cover, nesting, and roosting habitat for wildlife. Accordingly, establishing native wetland vegetation in these areas could increase habitat suitability for birds and other wildlife, contrary to the objectives of the WHMP and to overall aviation safety.