

**Appendix K**  
**Comments and Responses**  
**on the March 29, 2024 Draft Environmental Assessment**

The development of the Wilmington Riverfront Transportation Improvements has been informed by public outreach to the community, local agencies, and resources agencies. Various communication methods, including print, newspaper, website, email, and social media, were used to provide information about the study and gather input from citizens and other interested parties. The Draft EA was available for public review and comment from April 1, 2024 through May 15, 2024 on the project website (<https://www.riverfronteastconnect.com/>) and hard copies were available at the following locations: the Neighborhood House (1218 B St, Wilmington, DE 19801), Chase Center on the Riverfront (815 Shipyard Dr, Wilmington, DE 19801), and MSK Community Center (1009 Sycamore St, Wilmington, DE 19805).

The Federal Highway Administration (FHWA) and the City of Wilmington held a series of public hearings for the Project following the publication of the Draft EA in April 2024. This included one in-person hearing on April 15, 2024, from 5:30 – 8:00 p.m. at the Chase Center on the Riverfront, 815 Justison St, Wilmington, DE 19801. The in-person hearing was attended by 38 people from whom six comments were received via the written comment form and three via verbal testimony. Two virtual public hearings were held via Zoom on April 17, 2024, from 10:00 a.m. – 12:00 p.m. and 5:30 p.m. – 7:30 p.m. No comments were received during the morning session of the virtual public hearing, and two comments were received via verbal testimony during the evening virtual public hearing.

Copies of all comments received via comment form, online comment form, email, and public hearing testimony on the Draft Environmental Assessment (EA) are included as part of the record for the Project. No comments were received via voicemail. All comments received during the official comment period from April 1, 2024 through May 15, 2024 were reviewed by FHWA and the City. A total of 42 comments were received during the comment period from 38 individuals and organizations. Additionally, the U.S. Environmental Protection Agency submitted comments via letter on May 1, 2024.

All comments have been transcribed into tables and are presented alphabetically by the commenter's last name and assigned a number. The tables include the verbatim comments received, except for redacting certain personal information such as addresses and email addresses. All comments were reviewed and responded to.

**AGENCY COMMENTS**

#	Agency	Comment Format	Comment	Response
1	U.S. Environmental Protection Agency	Letter	<p><b>Alternatives Analysis.</b> Given the nature of the Project Purpose and Need, it is not clear that the binary Build/No Build analysis reflects the full range of alternatives that could achieve the Project Purpose and Need. The Final EA would be improved by a discussion of alternative configurations or other alternatives that were considered but not carried forward. The Final EA also could be improved by a discussion that the Build Alternative will likely have the effect of constraining future uses of the Project area. The EPA appreciates the Draft EA’s acknowledgment of future development plans for the Project area and efforts to consider indirect and cumulative effects from the planned development. The EPA encourages additional analyses of indirect and cumulative effects from the planned development if ultimately constructed.</p>	<p>As described in the Draft EA and Revised EA, under the Build Alternative the proposed street grid is a balance of defining buildable parcels as well as appropriate infrastructure access for vehicles (local, commuter, public transportation), pedestrians, and bicyclists. A new Riverwalk and public open space are proposed along with pedestrian and cyclist accommodations on new roadways and a new set of pedestrian and bicycle pathways that connect to the existing network of pathways surrounding the Project study area.</p> <p>Chapter III of the Revised EA describes that these Project goals could not be met in any other location. There are no practicable alternatives to this Project and the environmental benefits are considerable. The Project improves natural and beneficial floodplain values, as the action includes removal of contaminated soils, enhancing wetlands, improving wildlife habitat in enhanced wetland areas and, by eliminating invasive species, improving natural beauty and outdoor recreational opportunities via the Riverwalk and open space. All of the proposed improvements have the potential to provide community benefits by improving mobility and offering new, convenient options for accessing jobs, local economic destinations, and regional transit services.</p>

<p>2</p>	<p>U.S. Environmental Protection Agency</p>	<p>Letter</p>	<p><b>Environmental Justice.</b> While the Build Alternative would not cause relocations or exceedances of National Ambient Air Quality Standards (NAAQS) and would support cleanup of hazardous materials at the project area, the Final EA could be improved by assessing in more detail and proposing mitigation for the Project’s potential direct, indirect, and cumulative effects on surrounding communities. According to EJScreen, these communities are majority low-income and already experience some of the nation’s poorest air quality, highest rates of asthma and low life expectancy, and highest levels of climate-related flood risk. We continue to recommend the Final EA consider potential adverse local air quality effects of the remediation, construction activities, and mobile emissions from increased vehicle traffic that would not be captured in the larger geographic scale of the NAAQS analysis. In addition, while recognizing that the cleanup of hazardous materials, new infrastructure, and redevelopment at the Project area represents a positive change, the Final EA would benefit from considering potential impacts on surrounding communities from the change in the historic land use and whether the Build Alternative foreseeably will result in a change in the socioeconomic status of future users of the Project area. These types of changes have the potential to affect the surrounding communities in both positive and potentially adverse ways that could be appropriately analyzed in the Final EA.</p>	<p>As noted in Chapter III, Section B.1 of the Revised EA, it is anticipated that trucks traveling to and from the Project study area during construction would access the area via the I-495, US Business 13 / South Market Street, and Judy Johnson Drive. The construction plan would detail the construction of the main north-south spine road through the Project study area first, currently identified as Orange Street which will be used as a temporary construction haul road (Figure 2). Construction trucks and vehicles would access Orange Street from Judy Johnson Drive, travel through the site, and exit via South Market Street. This approach would limit the construction-related traffic to existing regional roadways and minimize Project-related construction traffic traveling through adjacent residential communities, thus reducing impacts of construction.</p> <p>Additionally, as noted in Chapter V, Section H of the Revised EA, while the plans for future redevelopment have not yet been finalized, future land use within the proposed Project study is waterfront mixed use and encourages infill and redevelopment in the area. The indirect effects of future redevelopment may be beneficial for the Project study area and greater indirect and cumulative effects analysis area. According to an EPA study, brownfield redevelopments generally showed significant environmental benefits, including lower vehicle use, reduced carbon dioxide and air pollutant emissions. On average, neighborhoods on former brownfield sites had higher development density, better travel accessibility, and improved transit access. Therefore, no substantial indirect effects to air quality are anticipated from the Build Alternative.</p> <p>As noted in the Revised EA, the direct effects from the Project’s transportation infrastructure improvements would be beneficial to all communities, both EJ and non-EJ communities and the Build Alternative is not expected to result in disproportionately high and adverse effects on EJ populations. The Project may result in indirect effects stemming from potential rising housing costs associated with planned future redevelopment. The Project may potentially result in increased property values as an indirect effect from the Project, but the specific effects to the surrounding communities, including to EJ populations, including Southbridge, Browntown, and Hedgeville near the Project study area, are not known at this time. It is also unknown whether affordable housing would be provided as part of planned future development.</p> <p>With consideration of the projects direct and indirect effects in mind, mitigation is not necessary. However, the City of Wilmington is making several commitments to the EJ community to further support investment in the EJ communities, specifically Southbridge. The City’s Office of Economic Development will work with the University of Delaware’s Local Government Grant Assistance Program and the Southbridge Civic Association in identifying and applying for grant funding in support of the improvements identified in the Southbridge Transportation Action Plan. Additionally, the City and the RDC will continue to investigate funding to plan, design, and construct a pedestrian connection from the Southbridge Community to the Wetland Park between C Street and South Church Street. The City will commit to funding and construction of the South Wilmington Sewer Separation project that includes construction of a separate storm drain system and partial sanitary sewer reconstruction along B and C Streets to help alleviate flooding in the Southbridge community. The City will commit to supporting businesses that qualify for the Office of Economic Development’s Strategic Fund set-aside for minority owned businesses, as well as providing notices to the Southbridge Civic Association for business development events hosted by the Office of Economic Development and economic development partners such as the Small Business Administration, Small Business Development Center, Delaware Division of Small Business, and Community Development Financial Institutions. Lastly, the City and RDC will commit to advertising and holding outreach events for construction workforce opportunities in nearby disadvantaged neighborhoods.</p>
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<p>3</p>	<p>U.S. Environmental Protection Agency</p>	<p>Letter</p>	<p><b>Public Engagement.</b> EPA appreciates the efforts of the lead agencies and the Project Sponsors to reach out to the local community and continues to strongly encourage that FHWA and Project Sponsors ensure a robust and transparent public review process for NEPA, Clean Water Act and FEMA floodplain permitting, brownfields redevelopment, National Historic Preservation Act assessments, and other local and state measures. We recommend the Project website or other online sources provide regular updates on the site’s redevelopment, including future land uses, beyond the NEPA review of its transportation component. The Final EA should document meaningful community engagement, including how FHWA has incorporated ideas from the community when practicable. We strongly recommend the Project team continue ensuring that public engagement activities are convenient and easily accessible to neighboring communities and provide language accommodations in Spanish.</p>	<p>Updates regarding the NEPA process for the Project will be made available on the Project website (<a href="https://www.riverfronteastconnect.com/">https://www.riverfronteastconnect.com/</a>). If FHWA determines that there are no significant impacts, a Finding of No Significant Impact (FONSI) would be issued and made available to the public on the Project website.</p> <p>The public can also follow the permitting process on the Federal Permitting Dashboard: <a href="https://www.permits.performance.gov/permitting-project/dot-projects/wilmington-riverfront-transportation-infrastructure-project">https://www.permits.performance.gov/permitting-project/dot-projects/wilmington-riverfront-transportation-infrastructure-project</a></p> <p>Lastly, the City and RDC will continue public notification throughout the construction process. Members of the public can refer to the project website for the latest information on Project implementation and upcoming activities.</p>
<p>4</p>	<p>U.S. Environmental Protection Agency</p>	<p>Letter</p>	<p><b>Floodplain Management</b> Given that the Project area is fully within the 100-year floodplain, EPA recommends that the lead agencies and Project Sponsors undertake coordination with the Federal Emergency Management Agency. The Final EA would benefit from documentation of this coordination and how the site will comply with applicable floodplain regulations. As part of that coordination, we recommend that the lead agencies confirm whether and how a proposed rulemaking to revise the Federal Flood Risk Management Standard (FFRMS) could affect the Project.</p>	<p>All actions occurring within the FEMA-designated 100-year floodplain would comply with FEMA and City prescribed local floodplain construction requirements. Chapter V, Section N of the Revised EA states the City of Wilmington has joined the National Flood Insurance Program (NFIP) and adopted local floodplain ordinances that are more restrictive than FEMA requirements. Specifically, the City of Wilmington Code of Ordinance (Sec. 48-572) states that construction is not permitted within special flood hazard areas without approval and new construction be built 18 inches above the 100-year floodplain. Under the NFIP, the City is responsible for reviewing and approving activities that encroach on the 100-year floodplain. No approving action is required by FEMA unless the activity results in changes to the 100-year floodplain elevation that requires changes to FEMA mapping.</p>

**PUBLIC COMMENTS**

#	First Name	Last Name	Comment Format	Comment	Response
1	Dee	A.	Online Comment Form	The area needs all the help it can get. People are concerned about contaminants, pollution and noise but they are the same ones littering in the streets, blasting noise and polluting the air with their vapes and hemi engine cars. Bring in all the infrastructures! Delaware needs it and so much more!!!	Thank you for your comment. Your support of the Project is noted.
2	Elizabeth	Aguilar	Online Comment Form	Hi it would be great for Wilmington riverfront to become a family area in the daytime. With a mini park or picnic area closing at dawn. Also public restrooms. I avoid going for this reason. Or shops and activities on both sides of river. Hammocks, solar garden, telescopes, feeding ducks, are all food activities.	<p>Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project. The purpose of the Project is transportation related improvements. See Chapter II of the Draft EA and Revised EA for additional discussion regarding the Project’s purpose and need.</p> <p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington’s Comprehensive Master Plan and South Market Street Master Plan. The City of Wilmington’s Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington’s boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities. See Chapter V, Section A of the Draft EA and Revised EA for additional discussion regarding the Project’s land use and zoning.</p>
3	Patricia	Anderson-Rice	Online Comment Form	There should be a bypass or something that takes drivers to directly to I-95 South faster. I believe that is where all accidents and fast drivers are heading too. Also, since the gas station on south market street is closed the drivers are rushing trying to get to Royal Farms before they run out.	Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project. The purpose of the Project is transportation related improvements. See Chapter II of the Draft EA and Revised EA for additional discussion regarding the Project’s purpose and need.

4	Nick	Bell	Online Comment Form	Bring more up to date stores like Polo Tommy Hill to the outlets so people won't have to travel out of state to get good clothes and bring in more water rides jet skies stuff kids can do in the water	<p>Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project. The Purpose of the Project is transportation related improvements. See Section II of the Draft EA and Revised EA for additional discussion regarding the Project's purpose and need.</p> <p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington's Comprehensive Master Plan and South Market Street Master Plan. The City of Wilmington's Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington's boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities. See Chapter V, Section A of the Draft EA and Revised EA for additional discussion regarding the Project's land use and zoning.</p>
5	Gary	Bloomer	Written Comment Form	The current 3 lanes of traffic set up coming over the South Market Street bridge is ineffective in terms of mitigating speeding. The speed limit over the bridge and down to the gas station is 25 mph, which NOBODY ADHERES TO! While access for EMS vehicles is essential, it shouldn't be beyond the realms of possibility to retain the central lane <u>only</u> for EMS use and to introduce speed bumps on the right and left lanes to slow down the great majority of drag strip racing.	Thank you for your comment. The City and RDC will coordinate with the Delaware Department of Transportation (DelDOT) on any improvements needed on South Market Street.



6	Monica	Castellano	Online Comment Form	<p>Please extend the public comment period for the draft environmental assessment regarding the Wilmington Riverfront Transportation Infrastructure Project to at least May 31st. Please also schedule an additional public meeting in the Southbridge neighborhood of South Wilmington so that the current residents most impacted by this proposal can provide meaningful comments that will be thoughtfully considered by the Federal Highway Administration (FHA), the City of Wilmington, and the Riverfront Development Corporation (RDC).</p>	<p>The Draft Environmental Assessment was published on April 1, 2024 and was available for public review and comment through May 1, 2024, consistent with 23 CFR § 771.119(d). In response to public comments requesting an extension of the comment period, FHWA provided a 15-day extension. The Draft EA comment period ended on May 15, 2024.</p> <p>Addressing public comments, a community outreach meeting was held in-person at the Neighborhood House community center in the Southbridge neighborhood on May 9, 2024, from 6 – 7 p.m. This meeting was advertised through the Environmental Justice (EJ) organization email list, and flyers distributed notifying the public of the comment period extension and community outreach meeting were provided to community centers in the area, including the Neighborhood House, Rose Hill Community Center, Latin American Community Center, MSK Community Center, the Route 9 Library and Innovation Center, and the Chase Center at the Riverfront. Finally, flyers were posted on community bulletin boards located within the ShopRite of Christina Crossing.</p> <p>This community outreach meeting was held in response to public comments requesting a meeting be held in the Southbridge neighborhood, east of the Project study area. Eleven attendees were present at the meeting, including Southbridge residents, members of the Southbridge Civic Association, Southbridge Community Development Corporation, and South Wilmington Planning Network (SWPN). Informational display boards from the in-person public hearing were available for viewing at the community outreach meeting, with the Project Team present to answer questions about the proposed project. Attendees were encouraged to fill out a written comment form at the community outreach meeting, or to provide comments through the online comment form, email, or voicemail in order for their concerns to be addressed in the Revised EA. In response to the public feedback, the City has added commitments to the revised EA. Refer to revised EA, Chapter V, Section R for details.</p>
7	Marion	Cuffy	Online Comment Form	<p>I have lived off Rogers Road in the development of Oakmont for many years and I have to say this is the best that I've seen the road so far, you guys are doing an amazing work, I would highly recommend a traffic light at the entrance of Oakmont, you have sometimes trucks parked blocking traffic which can cause a collision.</p>	<p>Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project. See Chapter II of the Draft EA and Revised EA for additional discussion regarding the Project's purpose and need.</p>
8	Steven	Dettwyler	Online Comment Form	<p>When will the construction on the east side of the river begin and what will occur in 2024 and 2025?</p>	<p>The City and RDC anticipate the construction of the infrastructure improvements proposed in the Build Alternative to take several years to complete. Upon completion of the NEPA process and prior to the start of construction, the City and the RDC would obtain the necessary permits and approvals for the Project (Draft and Revised EA, Table 11). After obtaining the necessary permits and approvals, archaeological investigations as described in the Section 106 Project Programmatic Agreement (Appendix H) as applicable and contaminated materials remediation activities will continue concurrently. The transportation infrastructure Project site work will then commence. The City and the RDC will continue public notification throughout the construction process.</p> <p>Updates regarding the NEPA process for the Project will be made available on the Project website (<a href="https://www.riverfronteastconnect.com/">https://www.riverfronteastconnect.com/</a>). The public can also follow the permitting process on the Federal Permitting Dashboard: <a href="https://www.permits.performance.gov/permitting-project/dot-projects/wilmington-riverfront-transportation-infrastructure-project">https://www.permits.performance.gov/permitting-project/dot-projects/wilmington-riverfront-transportation-infrastructure-project</a></p>

9	Diana	Dixon	Verbal Testimony	<p>My name is Diana Gibson. And what else did you want me to give? Oh, D-i-a-n-a, Diana, Dixon, D-i-x-s-o-n. Yeah. I'm on the elder side of Wilmington Street. I have a few questions, one that I wanted to know, what are the plans on -- what are they going to do on the park? Oh. So one of my comments is pertaining to the wetland park. Is that one of the comments I can comment on? Okay. My comment on that is I want to see both sides of that park to be developed where it can be seen. Like you can see from the Walnut Street side. If you go on the other side, like (indiscernible) and shrubbery. And what do you know development hasn't even been done. Like you can't see on the Walnut Street side, you can see the boardwalk and other cool things. But on the other side, you can't see anything that shows that the wetland park has been developed. And also light, I think there should be a lot more lighting, because of the children in the area. I think the lighting and development on both sides, mimic each other. That wasn't testimony. That was a concern.</p>	<p>Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project. The purpose of the project is transportation related improvements. See Chapter II of the EA and Revised EA for additional discussion regarding the Project's purpose and need.</p>
10	Pat	Dougherty	Online Comment Form	<p>People need and deserve a clean, safe, accessible riverfront to walk, shop, and dine. I'm looking forward to the comment session.</p>	<p>Thank you for your comment. Your support of the Project is noted.</p>



11	Kate	Dupont Phillips	Online Comment Form	<p>Dear Project Leads: In order to allow for adequate public input time, please extend the public comment period for the draft environmental assessment regarding the Wilmington Riverfront Transportation Infrastructure Project to at least May 31st. Please also schedule an additional public meeting in the Southbridge neighborhood of South Wilmington so that the current residents most impacted by this proposal can provide meaningful comments that will be thoughtfully considered by the Federal Highway Administration (FHWA), the City of Wilmington, and the Riverfront Development Corporation (RDC).</p> <p>Please focus this additional public meeting in the Southbridge neighborhood of South Wilmington on the potential flooding impacts of this project. Southbridge is uniquely impacted by tidal flooding compounded by large precipitation events. This proposal must consider how significant rainfall and high tide events, compounded by increased stormwater because of expanded development, could collectively flood Southbridge. Even if all stormwater collected in this project’s impact area is directed into the Christiana River, this could still increase the chance of flooding in Southbridge. This risk increases as precipitation and sea level rise increase over time because of climate change.</p> <p>The draft environmental assessment proposes raising the project area from the 100-year floodplain. Currently, the entire project area is located within the 100-year floodplain, as is the vast majority of Southbridge. To reduce the likelihood that this project will increase flooding in surrounding areas, stormwater management must go beyond raising the site. It must include infrastructure that will absorb water, and not just discharge it into the Christiana River. To that end, the riverwalk and open space areas in the current proposal must be expanded. Extension of the comment period is requested to allow for more meaningful engagement of the residents of Southbridge, who will be highly impacted by this project, and who are primarily low-income persons of color. Equity considerations should be at the forefront of this draft assessment, and are not currently adequately reflected. Thank you for your consideration.</p> <p>Kate Dupont Phillips Executive Director, Healthy Communities Delaware</p>	<p>The Draft Environmental Assessment was published on April 1, 2024 and was available for public review and comment through May 1, 2024, consistent with 23 CFR § 771.119(d). In response to public comments requesting an extension of the comment period, FHWA provided a 15-day extension. The Draft EA comment period ended on May 15, 2024.</p> <p>Addressing public comments, a community outreach meeting was held in-person at the Neighborhood House community center in the Southbridge neighborhood on May 9, 2024, from 6 – 7 p.m. This meeting was advertised through the Environmental Justice (EJ) organization email list, and flyers distributed notifying the public of the comment period extension and community outreach meeting were provided to community centers in the area, including the Neighborhood House, Rose Hill Community Center, Latin American Community Center, MSK Community Center, the Route 9 Library and Innovation Center, and the Chase Center at the Riverfront. Finally, flyers were posted on community bulletin boards located within the ShopRite of Christina Crossing.</p> <p>This community outreach meeting was held in response to public comments requesting a meeting be held in the Southbridge neighborhood, east of the Project study area. Eleven attendees were present at the meeting, including Southbridge residents, members of the Southbridge Civic Association, Southbridge Community Development Corporation, and South Wilmington Planning Network (SWPN). Informational display boards from the in-person public hearing were available for viewing at the community outreach meeting, with the Project Team present to answer questions about the proposed project. Attendees were encouraged to fill out a written comment form at the community outreach meeting, or to provide comments through the online comment form, email, or voicemail in order for their concerns to be addressed in the Revised EA. In response to the public feedback, the City has added commitments to the revised EA. Refer to revised EA, Chapter V, Section R for details.</p> <p>The floodplain assessment for the Project took into consideration the direct and indirect effects to the Project study area and surrounding areas include Southbridge. The analysis found that the risks associated with Project encroachment into the floodplain are minimal. The Project includes fill to raise the transportation infrastructure 18 inches above the 100-year floodplain in accordance with City of Wilmington floodplain development code. In other words, the elevation of the new infrastructure would no longer be in the base floodplain, and not subject to flooding during the 100-year storm. The Project would support base floodplain development and per City code, the development would also be elevated 18 inches above the 100-year floodplain and not subject to flooding during a 100-year storm. Elevating development parcels by 18 inches above the 100-year floodplain base flood elevation without any increases in other base floodplain elevation in the vicinity would reduce flood risk.</p> <p>Indirect effects from the Build Alternative to floodplains are anticipated to be negligible. The transportation infrastructure improvements proposed under the Build Alternative incorporate strategic resiliency solutions. The floodplain effect modeling included proposed development adjacent to the transportation infrastructure and found that the proposed development would not affect 100-year floodplain elevations.</p> <p>The Project would align with the vision and recommendations set out in the 2022 Resilient Wilmington: Preparing Today for Tomorrow’s Climate Risks. The proposed Project and future redevelopment would exceed City regulations that require the lowest floor of new buildings constructed in the floodplain to be at or above base flood elevation plus 18 inches and would</p>
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					<p>incorporate other recommendations for waterfront development as described in Resilient Wilmington. The incremental effect of the Build Alternative to floodplains, in light of past, present, and future effects, is expected to be relatively minimal due to existing regulatory controls and regulations, as well as an increased focus by the City of Wilmington to plan for and address the future effects of climate change. Therefore, as described here and as documented throughout this EA, the Project does not support incompatible development.</p> <p>The City will commit to funding and construction of the South Wilmington Sewer Separation project that includes construction of a separate storm drain system and partial sanitary sewer reconstruction along B and C Streets to help alleviate flooding in the Southbridge community.</p> <p>Direct effects to surface waters would be minimized in accordance with the Delaware 5101 Sediment and Stormwater Regulations. Per these regulations (Sections 5.6.2.1 and 5.3.3.3), the quality and quantity requirements are met through brownfield remediation and conveyance structure use best management practices (BMPs).</p> <p>As detailed in the remedial action plans, two feet of clean fill cap will be used to prevent contaminated soil erosion and human contact in the transportation improvement area. Hazardous material testing requirements would ensure that the clean fill used during construction is not contaminated. A closed storm drain network will be used for the non-erosive conveyance. Excavation associated with stormwater facilities with vertical depth is discouraged within brownfield sites due to the underlying contaminated soils. Refer to the Chapter V, Sections L and M and Appendix I for additional details on the water quality protections for the Project.</p>
12	Charles (Chuck)	Fleming	Written Comment Form	Please re do your study on the dBA of noise at rush hour or when buses travel over the South Market St. Bridge Stand at the northeast corner of the project at the end of the bridge, you will get decibel/dBA reading of 80 plus +	<p>The noise analysis for the Project considered noise impacts to the residents of the River Towers at Christina Landing and the Residences at Christina Landing which are near the South Market Street Bridge. Refer to Section G of the EA and Appendix D for the specific results at these residential communities. Short-term ambient noise measurements of 30-minute duration were acquired on June 1, 2022, at two receptor locations, M-01 and M-02; at Christina Landing, during periods of free-flowing traffic; periods with dry roadways and periods with low to moderate wind speeds. Measured noise levels were then compared to modeled noise levels, which were calculated by the FHWA’s Traffic Noise Model, version 2.5 (TNM 2.5). A difference of 3 A-weighted decibels (dBA) or less between measured noise levels and modeled noise levels is deemed acceptable, and receptors M-01 and M-02 were validated with differences of 2 dBA and 1 dBA, respectively (refer to Appendix D, Section II). Additional noise receptors were incorporated into the noise model after validation to predict the worst noise conditions for the loudest hour at all noise-sensitive land use locations within the Project study area. Common Noise Environments (CNE) were used to group together noise receptors that could be exposed to similar noise sources, noise levels, traffic conditions, and topographic features. The results of the noise analysis concluded there are no significant increases of 12 dBA or more associated with the proposed improvements.</p>
13	Sue	Frost	Written Comment Form	<u>Please</u> include additional public parking in the plan. Those of us on A Street have <u>no</u> parking for guests, contractors, or any additional needs.	<p>Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project. The Purpose of the project is transportation related improvements. See Chapter II of the EA and Revised EA for additional discussion regarding the Project’s purpose and need. The proposed street grid is a balance of defining buildable parcels as well as appropriate infrastructure access for vehicles (local, commuter, public transportation), pedestrians, and bicyclists and will include on street parking. See Chapter III, Section B of the Draft EA and Revised EA for additional details.</p>

14	Michael	Hahn	Online Comment Form	Where was this advertised? Only on the Redevelopment Corporation web did I find information and not the City?	The public involvement for this Project included outreach activities which were advertised in various ways. Refer to Chapter VI, Section B of the Draft EA and Revised EA which summarizes all the public involvement for this Project.
15	Clifton	Harris	Online Comment Form	Hello to whom it may concern. Good to hear of future development along the eastern side of the riverfront. My suggestion as a tax paying Delaware resident would be to add an Amusement park in draft plans. The perfect area in my opinion, would be to "ground zero" all structures from Fairview Inn motel - Glass & Alluminum. That area should resemble Luna Park, Coney Island. I also believe infrastructure should accommodate a 40,000 - 50,000 seat arena on land behind the Royal Farms on the riverfront. I seen an article recently on Delaware Online, Katt Williams, Mike Epps and others to tour NEAR Delaware lol. Meaning they'll be in Philly, Atlantic City, Baltimore, New York or DC. Why can't Delaware have its own A-list venue.	<p>Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project.</p> <p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington's Comprehensive Master Plan and South Market Street Master Plan. The City of Wilmington's Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington's boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities. See Chapter V, Section A of the Draft EA and Revised EA for additional discussion regarding the Project's land use and zoning.</p>
16	Novaeene	Johnson	Verbal Testimony	My problem is -- I have parking because I'm an owner, but my visitors, which is my kids, when they come to look for me, there's nowhere to park. So I'm wondering if that could be addressed also.	Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project. The purpose of the Project is transportation related improvements. See Chapter II of the EA and Revised EA for additional discussion regarding the Project's purpose and need. The proposed street grid is a balance of defining buildable parcels as well as appropriate infrastructure access for vehicles (local, commuter, public transportation), pedestrians, and bicyclists and will include on street parking. See Chapter III, Section B of the Draft EA and Revised EA for additional details.
17	Betty	Menkin	Online Comment Form	Long overdue to update the riverfront. It could have followed Baltimore Harbor done years ago. The are many things that could bring people there, water taxis and paddle boats. Outdoor eating, music festivals and food festivals like Chicago. Plays, gambling venues. Food carts. Amusement park, waterfalls colored lights in fountain.	<p>Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project. The purpose of the Project is transportation related improvements. See Chapter II of the EA and Revised EA for additional discussion regarding the Project's purpose and need.</p> <p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington's Comprehensive Master Plan and South Market Street Master Plan. The City of Wilmington's Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington's boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities. See Chapter V, Section A of the Draft EA and Revised EA for additional discussion regarding the Project's land use and zoning.</p>

18	Betty	Menkin	Online Comment Form	Many things should have been done when Baltimore Harbor updated their waterfront. see my suggestions at beginning comment when interested with changes.	Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project. The purpose of the project is transportation related improvements. See Chapter II of the EA and Revised EA for additional discussion regarding the Project’s purpose and need.
19	Victoria	Miranda	Online Comment Form	Pedestrian accessibility is very critical to the growth of the city. Wilmington has a lot of potential, but accommodating cars shouldn’t be the key. People want to be brought together as a community. This city is very gloomy and doesn’t feel like something I want to step outside my car to be honest. There’s not a lot of grass. It’s a shame that the city is eerie because it is in a nice spot geographically.	The proposed bicycle and pedestrian infrastructure under the Build Alternative will help improve safety, connectivity, and mobility. The purpose of the project is transportation related improvements. See Chapter II of the EA and Revised EA for additional discussion regarding the Project’s purpose and need.
20	David	Morrissey	Written Comment Form	Please verify that the documents on the web are error free (specific problem found in DraftEA_AppC_HazMatReportAppendices_03.29.2024.pdf) the text is not readable due to many dropped characters. See Sanborn® Map: 1901 1989 etc. page 382 and following in PDF. I did not review other documents.	A citizen noted to project staff at the Public Hearing on April 15 <sup>th</sup> that there was error with the font and letters were missing on in some of the pages of the Draft EA, Appendix C: Hazardous Materials Technical Report. The project staff reprocessed the pdf of the subject document and the reposted the corrected pdf on the project website on April 16, 2024. ( <a href="https://www.riverfronteastconnect.com/wp-content/uploads/2024/04/Wilmington_DraftEA_AppC_HazMatReportAppendices_04.16.2024_web.pdf">https://www.riverfronteastconnect.com/wp-content/uploads/2024/04/Wilmington_DraftEA_AppC_HazMatReportAppendices_04.16.2024_web.pdf</a> )
21	Diane	Nugent	Written Comment Form	I am very supportive of the BUILD option. I am a current resident @ Christina Landing and love living along the river. I hope to see an increase in pedestrian pathways and lifestyle improvements including residential, retail, parks and dining options. However, I am most concerned about increased traffic, especially with the rise in recent accidents @ 100 block of S. Market. Also, with the potential for increase water craft, urge the RDC + City of Wilmington to consider options to clear debris in the Christina River such as large trees + other branches. With the river being tidal, these debris flow from the Brandywine into the Christina River + remain in the tide impacting rowers + other river craft. <u>Focus on pedestrian safety</u>	Thank you for your comment. Your support for the Project is noted.  The proposed bicycle and pedestrian infrastructure under the Build Alternative will help improve safety, connectivity, and mobility. The City and RDC will coordinate with the Delaware Department of Transportation (DelDOT) on any improvements needed on South Market Street. See Chapter III, Section B of the Draft EA and Revised EA for additional details.
22	Diane	Nugent	Verbal Testimony	My name is Diane Nugent, N-U-G-E- N-T. I'm very excited to see this project start eventually. I'm disappointed it will be more time, but I understand the process. My biggest concern out of all of it is public safety. There's been a number of accidents right on Market Street, right in our neighborhood, right at our neighborhood. That's my biggest concern right now. How are we going to control the traffic, especially with all the construction that's coming in. So I would like to make sure that that is considered. I had other comments, but they were in the paper this morning.	As part of the development of the <i>South Market Street Master Plan</i> a traffic study was conducted in 2021. Refer to Appendix A for the South Market Street Redevelopment Master Planning Traffic Operation Analysis Report. This analysis informed the traffic and transportation improvements needed in the Project study area.  The proposed roadway grid under the Build Alternative considers major circulation movements, creating three east-west and evenly spaced signalized movements across South Market Street, and connecting the major north-south Market Street and Walnut Street corridors to Orange Street within the limits of the Project study area. The traffic analysis informed the need for three new traffic lights on South Market Street from north to south: at A Street, Howard Street, and Jones Street. The City and the RDC will coordinate with the Delaware Department of Transportation (DelDOT) on any improvements needed on South Market Street.  It is anticipated that trucks traveling to and from the Project study area during construction would access the area via the I-495, US Business 13 / South Market Street, and Judy Johnson Drive. The construction plan would detail the construction of the main north-south spine road through the Project study area first, currently identified as Orange Street which will be used as a temporary construction haul road (Figure 2). Construction trucks and vehicles would access Orange Street from Judy Johnson Drive, travel through the site, and exit via South Market Street. This approach would limit the construction-related traffic to existing regional roadways and minimize Project-related construction traffic traveling through adjacent residential communities.



23	Victor	Perez	Verbal Testimony	<p>Thank you for holding this public hearing and open comment section. I just had a couple of comments that I wanted to provide, question that I could just leave out there for everyone to think about, if I may. And the first has to do with the use of the census tracked and the comparison communities. In particular, census track 19.02. The data available for two block groups that make up census track 19.02 and the two block groups are made up of significantly different demographic compositions. And if I may refer to a publication from 2022 by myself and colleagues, Bill Swiatek, in Delaware Journal of Public Health, the changes in demographics in those two block groups are indicative of potential changes in the future that could be hastened by development that is happening to the western part of census track 19.02. And so I was just curious why it's showing Christina Landing, for example, and parts associated as not different from the community of Southbridge. Why that was kind of obscured, if I may use that term, in the presentation ultimately in the assessment. And my second point has to do with the Southbridge neighborhood action plan. As far as I can tell, there is no mention of the Southbridge neighbourhood action plan throughout any of the job assessments and social economic or EJ components. And that plan was developed specifically to try and really sort of guide the community of Southbridge into the future. But also provide others with a roadmap of what the community preferences might be. And obviously, the community of Southbridge, the core residential community at least, being roughly .75 miles away. The impact potential -- the potential is very significant, but there is no mention of that community plan that I could find at all. And with the potential for 4,300 new residential spaces in census track 19.02, I was just curious as to how this separation between one community that is less than a mile away from a potential developing community. How the snap plan wasn't mentioned. And then, lastly, my other point was, page 36 of Appendix J is sort of indicative of some of my concerns with the language in the social economic and other reports. Where we talk about the potential for support for the project from each of the communities surrounding and the lack of potential, or at least anticipated displacement. But then a little bit later on, on page 36 on the second paragraph, I believe -- the third full paragraph, has to do with "one future redevelopment occurs, whether they would be accessible to these community services and business to meet the needs of each populations is sort of unknow. The makeup demographics surrounding the -- Okay. Thank you.</p> <p>So to further the quote "-- the make up of demographics in communities surrounding the project study area may shift over time with potentially rising property values, potential rising housing costs, could add undue burden to EJ populations which could over time incrementally add to the overall community effect held by those populations." And I'm just curious how the group reconciles those two potential very different outcomes. Thank you very much.</p>	<p>The latest data regarding population, race, economy, employment, and other demographics was available through the U.S. Census Bureau's (2021) American Community Survey (ACS) 2017-2021 5-Year Estimates as well as state, regional and local sources. Data was collected at the block group level within the defined Socioeconomic Study Area. Data was used at the block group level for a more detailed geographic analysis of the data, as block groups are the smallest geographic census unit available for the ACS and the most recent available data from the U.S. Census Bureau. The census tract data used to obtain the 2021 federal grant funding, referenced in the comment, was not the latest available demographic data, and therefore, was not used in the NEPA documentation for this Project. See Chapter V, Section E and Appendix B for additional details.</p> <p>The Socioeconomic Study Area was determined by selecting U.S. Census block groups surrounding the Project study area. Block groups one mile to the south and east were selected to cover the surrounding communities of the Project study Area. The Team also used the 2013 Wilmington Area Planning Council (WILMAPCO) completed an EJ study as part of their Transportation Equity Report. Additionally, the Transportation Justice Plan further maps out a Title VI, EJ, Americans with Disability Act, and Language Assistance plan for the WILMAPCO region. In both cases the Project used latest available data. Concerns about established Census boundaries and data should be directed to WILMAPCO and New Castle County.</p> <p>The Southbridge Neighborhood Action Plan is outside the scope of this Project which is focused on construction of transportation infrastructure improvements for the South Market Street Riverfront East area of the City. The Proposed Action would expand the road network branching from South Market Street towards the Christina River and replicating the downtown Wilmington grid system in the Project study area. While plans for development have not been finalized, future land redevelopment is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities.</p> <p>In addition, the NEPA document acknowledges the Southbridge Transportation Action Plan several places. In addition, the City's Office of Economic Development will work with the University of Delaware's Local Government Grant Assistance Program and the Southbridge Civic Association in identifying and applying for grant funding in support of the improvements identified in the Southbridge Transportation Action Plan. Additionally, the City and the RDC will continue to investigate funding to plan, design, and construct a pedestrian connection from the Southbridge Community to the Wetland Park between C Street and South Church Street.</p>
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<p>24</p>	<p>Victor</p>	<p>Perez</p>	<p>Online Comment Form</p> <p>1) We realize that the EA Draft is for the transportation infrastructure, but it lays the groundwork for future development in the area. This development does not include definitive plans for affordable housing or other amenities directly supporting the community of Southbridge.</p> <p>2) A lack of transparency when it comes to the impact of the transportation plans, as well as future development, on any additional burdens of flooding in the community of Southbridge due to increased impervious surfaces.</p> <p>3) Though available, Census block data was not used to define the disadvantaged/environmental justice communities for the assessment, while Census block group and tract data was. Census tract 19.02, as data (home price/Census block data) shows, has significant wealth and racial differences when comparing the western part of the tract to the core residential community of Southbridge, defined here as the community to the east of the wetland park. Tract data were used to help obtain funding for transportation infrastructure development, and there are numerous threads attesting to the benefits that the tract will receive due to the future development, but these benefits are based on speculation. Use of more fine-grained data would show that the Riverfront neighborhoods that this project stands to primarily benefit are both majority White and economically-advantaged, while both the Browntown and Southbridge neighborhoods (which happen to share block group and tract boundaries with the Riverfront) are majority minority and economically-disadvantaged.</p> <p>4) Though support for the Southbridge Transportation Action Plan (STAP) is mentioned in the EA Draft, the broader and more widely encompassing community plan called the Southbridge Neighborhood Action Plan (SNAP) is not referenced at all, to our knowledge. The STAP develops the mobility recommendations of the SNAP, but does not cover other critical community needs, including housing, environment, health, youth and education, and economy. The SNAP has numerous citations respective to the Riverfront East development, and by definition its transportation infrastructure, calling for coordination, cooperation, and support for the community of Southbridge because the Riverfront East will undoubtedly change the social, economic, and demographic landscape of South Wilmington within the next two to three decades. As one of the most significant and ambitious development plans in generations in the City of Wilmington, with an estimated 4,000 more residences at market rate, we are troubled by the lack of direct attention to the SNAP.</p> <p>5) Similar to the above, a joint letter from the Southbridge Civic Association, Southbridge Community Development Corporation, and South Wilmington Planning Network sent in January 2023 outlining concerns and recommendations for aspects of the SNAP that could be included with this project to increase its equity benefits was not referenced: <a href="https://swpn.org/wp-content/uploads/2023/03/2.-south-market-street-sbca-swpn-sbccdc-jan-2023.pdf">https://swpn.org/wp-content/uploads/2023/03/2.-south-market-street-sbca-swpn-sbccdc-jan-2023.pdf</a></p> <p>6) Our concerns also include the potential increase of car traffic in Southbridge, which according to our rough estimates, equates to about 180 more cars in the morning and afternoon peaks traveling through the community per day to reach the new development via A Street.</p> <p>7) In various parts of the EA Draft, the benefits to the community of Southbridge are touted, though these benefits are not referenced with any appropriate citations of academic</p>	<p>1. The purpose of the Project is to provide transportation infrastructure to further the connectivity of the riverfront area and provide multi-modal resources. While plans for development have not been finalized, future land redevelopment is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities. Additionally, the Project may potentially result in increased property values as an indirect effect from the Project, but the specific effects to the surrounding communities, including to Environmental Justice (EJ) populations near the Project study area, are not known at this time. It is also unknown whether affordable housing would be provided as part of planned future development.</p> <p>2. Consideration of floodplain impacts resulting from the Project was conducted and documented in Chapter V, Section N of the Draft and Revised EA as well as in greater detail in Appendix I. The majority of the Project study is within National Flood Insurance Program (NFIP) developed Flood Insurance Rate Map (FIRM) number 10003C0156L, effective January 22, 2020 (Appendix A, Figure 10, of the Natural Resource Technical Report, Appendix I). The Project area is impacted by coastal flooding regardless of this Project. Any actions (including construction) in base floodplains (i.e., 100-year floodplain) must comply with FHWA’s regulation 23 CFR 650 Subpart A. 23 CFR 650 Subpart A prescribes FHWA policies and procedures for the location and hydraulic design of highway encroachments in floodplains. 23 CFR 650 Subpart A includes the FHWA policy of avoiding longitudinal and significant encroachment into the floodplain and minimizing adverse impacts to base floodplains while preserving natural and beneficial floodplain values and remaining consistent with the intent of the FEMA administered National Flood Insurance Program (NFIP). While 23 CFR 650 Subpart A seeks to avoid actions in base floodplains, the regulation also prescribes studies, procedures, and documentation required when the action cannot avoid an encroachment in the base floodplain. In addition, the City will commit to funding and construction of the South Wilmington Sewer Separation project that includes construction of a separate storm drain system and partial sanitary sewer reconstruction along B and C Streets to help alleviate flooding in the Southbridge community.</p> <p>3. The latest data regarding population, race, economy, employment, and other demographics was available through the U.S. Census Bureau’s (2021) American Community Survey (ACS) 2017-2021 5-Year Estimates as well as state, regional and local sources. Data was collected at the block group level within the defined Socioeconomic Study Area. Data was used at the block group level for a more detailed geographic analysis of the data, as block groups are the smallest geographic census unit available for the ACS and the most recent available data from the U.S. Census Bureau. The census tract data used to obtain the 2021 federal grant funding, referenced in the comment, was not the latest available demographic data, and therefore, was not used in the NEPA documentation for this Project.</p> <p>The Socioeconomic Study Area was determined by selecting U.S. Census block groups surrounding the Project study area. Block groups one mile to the south and east were selected to cover the surrounding communities of the Project study Area. The Team also used the 2013 WILMAPCO completed an EJ study as part of their Transportation Equity Report. Additionally, the Transportation Justice Plan further maps out a Title VI, EJ, Americans with Disability Act, and Language Assistance plan for the WILMAPCO region. In both cases the Project used latest available data. Concerns about established Census boundaries and data should be directed to WILMAPCO and New Castle County.</p>
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			<p>research or reports that we are aware of. Moreover, the benefits tend to speak of increased access to “green spaces” and “commercial” activity, while not providing specific information about long-term economic gains that include jobs and other community investments that promote stability like local business (i.e., black-owned local business). Simultaneously, there are also references to the “potential adverse effects” to the core residential community of Southbridge if, as the draft states, property values in the area increase and have consequent impacts on rent and taxes in the area. There is a wealth of academic research that suggests the direct and indirect financial burdens on disadvantaged communities, as a result of environmental and development-related gentrification, is considerable and includes long-term displacement.</p> <p>8) One advantage that we do see refers to the approximate 200 construction-related jobs with the transportation development, but there are few to no longer-term guarantees regarding local employment or the training and hiring of local workers for these construction jobs.</p> <p>9) We appreciate the presentation of this EA at the April SWPN meeting. However, project staff entering into “listening mode” and not engaging with community members and others when questions and points were raised about the project is not conducive to overall learning and understanding. We encourage staff to openly discuss project elements rather than holding formal hearings and listening sessions only.</p> <p>10) The Environmental assessment as it is written and presented focuses on the contamination capping and infrastructure. The effects on this on the environment and neighboring community are narrowly focused in the discussion, where it is stated that no negative impact will be experienced, and no mitigation is needed. It becomes clear upon review that the actions proposed are limited in this assessment and the focus is the infrastructure. The development that would result from building the roads in not being adequately included into the assessment of the impacts on the environment and community. An Environmental Assessment is supposed to look at the cumulative impacts of the Federal Highways Administration (FHWA) funding and actions, and as the development is tied to the infrastructure then it all needs to be included in detail of the assessment. In this assessment, road infrastructure on its own will not impact the surrounding underserved communities (i.e. Southbridge) for the most part, but the development of the area will heavily impact on the community through gentrification and creating a further break in the southbridge landscape. The development, as it seems, will focus on larger buildings with retail (at ground level) with commercial and residential space above them. This extension of downtown Wilmington is not designed to support lower income underserved neighborhoods and communities next to this area. This development is focused on higher income residents. The further displacement of the neighboring community is apparent, as this plan does not mention that the only supermarket in walking distance to the community will be demolished and replaced with retail stores and residential space. The EA mentions only one business will be impacted (a gas station) and this illustrates that the focus is the impact of the infrastructure, not the true cumulative impacts of the entire project and federal action. This entire EA is intentionally bias in how it assesses the impacts, and a fair assessment on the community is not occurring. The EA is not allowing the community to understand and comment on the larger (cumulative) impact of the infrastructure and development impacts and the overall effects. The further development will be done in a fashion where community input and review will be minimized or focused on smaller pieces. The true impact and mitigation needs will never be truly determined as the process is proceeding currently.</p>	<p>4. The Southbridge Neighborhood Action Plan is outside the scope of this Project which is focused on construction of transportation infrastructure improvements for the South Market Street Riverfront East area of the City. The Proposed Action would expand the road network branching from South Market Street towards the Christina River and replicating the downtown Wilmington grid system in the Project study area. While plans for development have not been finalized, future land redevelopment is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities.</p> <p>In addition, the NEPA document acknowledges the Southbridge Transportation Action Plan several places. In addition, the City’s Office of Economic Development will work with the University of Delaware’s Local Government Grant Assistance Program and the Southbridge Civic Association in identifying and applying for grant funding in support of the improvements identified in the Southbridge Transportation Action Plan. Additionally, the City and the RDC will continue to investigate funding to plan, design, and construct a pedestrian connection from the Southbridge Community to the Wetland Park between C Street and South Church Street.</p> <p>5. FHWA and the City acknowledge receipt of the January 31, 2023 letter from the Southbridge Civic Association, Southbridge Community Development Corporation, and South Wilmington Planning Network. The City responded to the letter on February 10, 2023 and the concerns raised in the letter were considered in the development of the Draft EA. For example, a 30-day notice of the public hearings was published on March 15, 2024.</p> <p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington’s Comprehensive Master Plan and South Market Street Master Plan. The City of Wilmington’s Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington’s boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities.</p> <p>6. As part of the development of the South Market Street Master Plan a traffic study was conducted in 2021. Refer to Appendix A for the South Market Street Redevelopment Master Planning Traffic Operation Analysis Report. This analysis informed the traffic and transportation improvements needed in the Project study area. The proposed roadway grid under the Build Alternative considers major circulation movements, creating three east-west and evenly spaced signalized movements across South Market Street, and connecting the major north-south Market Street and Walnut Street corridors to Orange Street within the limits of the Project study area. The traffic analysis informed the need for three new traffic lights on South Market Street from north to south: at A Street, Howard Street, and Jones Street.</p> <p>It is anticipated that trucks traveling to and from the Project study area during construction would access the area via the I-495, US Business 13 / South Market Street, and Judy Johnson Drive. The construction plan would detail the construction of the main north-south spine road</p>
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			<p>11) In the meetings and in discussions with partners, it has been mentioned that the modeling used to determine that the project will not cause flooding to the neighboring communities is poorly constructed and the model used is not appropriate to determine the flooding impacts. This is of great concern, because if the project is built and it is then determined that flooding has become worse of the neighboring residents than little can be done to undo the impacts. The highest level of investigation should be done to assess the impact of the project on community flooding, and this should also include the development of the area in this assessment. It was mentioned by partners that the maps of the flooding do not show the buildings that will be built so the flood modeling and maps do not accurately represent the conditions that are proposed. The entire Southbridge area experiences major flooding and storm water issues. The EA is not clear if stormwater will increase or be reduced from the project (it mentions both in different locations), and this is probably due to the EA narrowly focusing on the infrastructure and not the total footprint of all development that results from the federal infrastructure investments. Community flooding in not being taken seriously in this assessment as adequate modeling was conducted, so a true impact cannot be reviewed by the community.</p> <p>12) Please extend the public comment period for the draft environmental assessment regarding the Wilmington Riverfront Transportation Infrastructure Project to at least May 31st. Please also schedule an additional public meeting in the Southbridge neighborhood of South Wilmington so that the current residents most impacted by this proposal can provide meaningful comments that will be thoughtfully considered by the Federal Highway Administration (FHA), the City of Wilmington, and the Riverfront Development Corporation (RDC).</p> <p>13) Please focus this additional public meeting in the Southbridge neighborhood of South Wilmington on the potential flooding impacts of this project. Southbridge is uniquely impacted by tidal flooding compounded by large precipitation events. This proposal must consider how significant rainfall and high tide events, compounded by increased stormwater because of expanded development, could collectively flood Southbridge. Even if all stormwater collected in this project’s impact area is directed into the Christiana River, this could still increase the chance of flooding in Southbridge. This risk increases as precipitation and sea level rise increase over time because of climate change.</p> <p>14) The draft environmental assessment proposes to raise the project area out of the 100-year floodplain. Currently, the entire project area is located within the 100-year floodplain, as is the vast majority of Southbridge. In order to reduce the likelihood that this project will increase flooding in surrounding areas, stormwater management must go beyond raising the site and must include infrastructure that will absorb water, and not just discharge it into the Christiana River. To that end, the riverwalk and open space areas in the current proposal must be expanded.</p>	<p>through the Project study area first, currently identified as Orange Street which will be used as a temporary construction haul road (Figure 2). Construction trucks and vehicles would access Orange Street from Judy Johnson Drive, travel through the site, and exit via South Market Street. This approach would limit the construction-related traffic to existing regional roadways and minimize Project-related construction traffic traveling through adjacent residential communities.</p> <p>7. Future redevelopment of the Project study area is anticipated to have beneficial effects to neighborhoods and community facilities. The South Market Street Master Plan proposes to create a new neighborhood with mixed-use development and community facilities and potential for new commercial/retail space that does not currently exist in the Project study area. Community facilities and services do not currently exist within the Project study area and, therefore, the planned future redevelopment is anticipated to be a beneficial indirect effect of the Project.</p> <p>Additionally, the Project may potentially result in increased property values as an indirect effect from the Project, but the specific effects to the surrounding communities, including to EJ populations, including Southbridge, Browntown, and Hedgeville near the Project study area, are not known at this time. It is also unknown whether affordable housing would be provided as part of planned future development.</p> <p>8. The Build Alternative proposes to provide economic benefits by improving mobility and offering new, convenient options for accessing jobs, local economic destinations, and regional transit services. Construction of the Build Alternative is anticipated to create 200 construction-related jobs in the community. Through future redevelopment on the site and addition of office and retail space, an indirect effect of the Project could result in a potential increase in businesses and employment within the Project study area. The City will commit to supporting businesses that qualify for the Office of Economic Development’s Strategic Fund set-aside for minority owned businesses. Provide notices to the Southbridge Civic Association for business development events hosted by the Office of Economic Development and economic development partners such as the Small Business Administration, Small Business Development Center, Delaware Division of Small Business, and Community Development Financial Institutions. The City and RDC will commit to advertising and holding outreach events for construction workforce opportunities in nearby disadvantaged neighborhoods.</p> <p>9. The Project Team was invited to attend the April South Wilmington Planning Network to present the findings of the Draft EA on April 23, 2024. However, since this presentation occurred during the official comment period, it was recommended that in order to get an official response addressed by FHWA and the City that comments and questions should have been submitted through the several options provided including: the comment form at the in-person public hearing; via the online comment form at <a href="https://www.riverfronteastconnect.com/">https://www.riverfronteastconnect.com/</a>; or verbally at the in-person or virtual public hearings.</p> <p>10. As required by NEPA, the Project team analyzed the effects or impacts, including direct, indirect, and cumulative effects to the human environment from the proposed Build Alternative that are reasonably foreseeable. The results of the direct, indirect, and cumulative effects from the Build Alternative are presented for each resource analyzed in the Draft and Final EA in Chapter</p>
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					<p>V, and in greater detail in Appendix J: Indirect and Cumulative Effects Technical Report. The results of the indirect and cumulative effects analysis are summarized below.</p> <p>The Build Alternative proposes transportation infrastructure improvements, stormwater management and resiliency solutions, and remediation of contaminated soils where transportation infrastructure improvements are proposed. Potential indirect effects from the Build Alternative are anticipated to be primarily related to the conversion of former industrial, underutilized properties to a mixed-use, pedestrian-friendly development along the east Christina riverfront that would add residential, commercial, and open space and improve connectivity and mobility for vehicles (including public transportation), pedestrians, and bicyclists. Induced growth surrounding the Project study area is unlikely to result, as much of the surrounding area, including downtown Wilmington and the west Christina riverfront, is already a developed urban environment and contains established neighborhoods and communities. Additionally, the City of Wilmington and much of the Indirect and Cumulative Effects Analysis Area is anticipated to see negative population and employment growth between 2015 and 2050 (Section IV.B).</p> <p>The Project proposes to provide infrastructure, including appropriate transportation infrastructure, such as the replication of the street grid, pedestrian/bicycle accommodations, and a Riverwalk within the Project study area. The need of the Project has arisen to further the connectivity of the riverfront area and provide multi-modal resources. In the Project study area, future land use changes and redevelopment of the east Christina Riverfront are anticipated to occur as laid out in the South Market Street Master Plan. The indirect land use, community, and mobility effects from the Project are expected to be beneficial to the Project study area and the surrounding area. Indirect effects of the Project, which would include the build out of the South Market Street Master Plan, are also anticipated to bring beneficial land uses to the Project study area to maximize the potential of what is currently underutilized property.</p> <p>There would be potential for indirect effects to natural resources, including wetlands, waterways, and floodplains, including a potential increase in impervious area as future development progresses; however, the Project and future development are also anticipated to improve conditions by raising the site above the floodplain, implementing additional resiliency solutions, and meeting quantity and quality requirements through brownfield remediation and non-erosive conveyance, erosion and sediment control. Indirect effects to vegetation, wildlife, sensitive species, and habitat are expected to be limited due to the nature of the Project study area. Overall, effects to these resources would also be minimized by regulatory requirements and permitting.</p> <p>Indirect effects resulting from construction of the Project and future redevelopment related to hazardous materials could include leaching of chemicals from one contaminated site to adjacent properties or groundwater. Remediation and capping of the contaminated soils required for the proposed transportation infrastructure improvements as part of this Project and remediation carried out by the City, the RDC, the EPA, and the DNREC would ensure that the site is prepared and indirect effects from hazardous materials would be mitigated.</p> <p>Indirect and cumulative effects to air quality from the Build Alternative are not anticipated to cause or contribute to any violation of the National Ambient Air Quality Standards (NAAQS). Furthermore, the Build Alternative is accounted for in the annual conformity analysis conducted by WILMAPCO, which represents a cumulative effects assessment for purposes of regional air</p>
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					<p>quality. Therefore, no substantial indirect or cumulative effects to air quality are anticipated from the Build Alternative. Indirect and cumulative effects to Greenhouse Gas (GHG) emissions from the Build Alternative would include increased GHG emissions, primarily due to the construction and operations and maintenance, as well as from the vehicle miles traveled on the new alignment roadway.</p> <p>Past development and transportation projects have had effects to socioeconomic, cultural, and natural resources, as well as noise and hazardous materials within the Indirect and Cumulative Effects Analysis Area. Reasonably foreseeable present and future projects will likely continue to affect these resources; however, effects would be lower due to the combined effects of laws and regulations that protect resources; the highly developed, urban Project setting; and zoning/land use regulations and planning processes established by the Indirect and Cumulative Effect Analysis Area jurisdictions.</p> <p>The incremental effects of the Project, considered in light of the past, present, and future actions affecting the environment are anticipated to be minimal. The Project proposes to provide infrastructure that would be constructed to further the connectivity of the riverfront area and provide multi-modal resources. Ultimately, the proposed improvements would serve the area, which is anticipated to experience future redevelopment of underutilized, former industrial properties that are located in a developed, urban setting. As described in the South Market Street Master Plan, the Project study area is expected to eventually be transformed into a mixed-use, pedestrian-friendly environment that would benefit the Project study area and surrounding community. The Project study area is relatively small and contained, compared to the approximately 12,300 acres in the greater Indirect and Cumulative Effects Analysis Area.</p> <p>11. The proposed conditions modeling does account for increased impervious area, new roadways, and new buildings to accurately estimate changes in water surface elevations, velocities, discharges, and flow patterns. Site specific data, including topographic, bathymetric, and digital elevation data was compiled as part of the modeling effort to most accurately represent existing conditions based on available data. Future flood protection measures can be incorporated into and/or used in conjunction with the hydrodynamic models to evaluate performance and feasibility of specific measures as they are developed.</p> <p>Based on City of Wilmington Code the minimum elevation of proposed infrastructure is 18" above the 100-year FEMA flood elevation of 9.0'. As a result of this, the minimum proposed project elevation is 10.5-feet with the exception of the roadways/sidewalks that tie into adjacent existing facilities.</p> <p>A floodplain approval from the City of Wilmington will be required for the Project during final design. Floodplain applications are reviewed by the Floodplain Administrator, who interprets floodplain boundaries and proposed construction activities to assess impacts and provide approval of the Project. The City of Wilmington has joined the National Flood Insurance Program (NFIP) and adopted local floodplain ordinances that are more restrictive than FEMA requirements. Under the NFIP, the City is responsible for reviewing and approving activities that encroach on the 100-year floodplain. No approving action is required by FEMA unless the activity results in changes to the 100-year floodplain elevation that requires changes to FEMA mapping.</p> <p>Direct effects to surface waters would be minimized in accordance with the Delaware 5101 Sediment and Stormwater Regulations. Per these regulations (Sections 5.6.2.1 and 5.3.3.3), the</p>
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					<p>quality and quantity requirement are met through brownfield remediation and conveyance structure use best management practices (BMPs).</p> <p>As detailed in the remedial action plans, two feet of clean fill cap will be used to prevent contaminated soil erosion and human contact in the transportation improvement area. Hazardous material testing requirements would ensure that the clean fill used during construction is not contaminated. A closed storm drain network will be used for the non-erosive conveyance. Excavation associated with stormwater facilities with vertical depth is discouraged within brownfield sites due to the underlying contaminated soils. Refer to the Chapter V, Sections L and M and Appendix I for additional details on the water quality protections for the Project.</p> <p>12. The Draft Environmental Assessment was published on April 1, 2024 and was available for public review and comment through May 1, 2024, consistent with 23 CFR § 771.119(d). In response to public comments requesting an extension of the comment period, FHWA provided a 15-day extension. The Draft EA comment period ended on May 15, 2024.</p> <p>Addressing public comments, a community outreach meeting was held in-person at the Neighborhood House community center in the Southbridge neighborhood on May 9, 2024, from 6 – 7 p.m. This meeting was advertised through the Environmental Justice (EJ) organization email list, and flyers distributed notifying the public of the comment period extension and community outreach meeting were provided to community centers in the area, including the Neighborhood House, Rose Hill Community Center, Latin American Community Center, MSK Community Center, the Route 9 Library and Innovation Center, and the Chase Center at the Riverfront. Finally, flyers were posted on community bulletin boards located within the ShopRite of Christina Crossing.</p> <p>This community outreach meeting was held in response to public comments requesting a meeting be held in the Southbridge neighborhood, east of the Project study area. Eleven attendees were present at the meeting, including Southbridge residents, members of the Southbridge Civic Association, Southbridge Community Development Corporation, and South Wilmington Planning Network (SWPN). Informational display boards from the in-person public hearing were available for viewing at the community outreach meeting, with the Project Team present to answer questions about the proposed project. Attendees were encouraged to fill out a written comment form at the community outreach meeting, or to provide comments through the online comment form, email, or voicemail in order for their concerns to be addressed in the Revised EA. In response to the public feedback, the City has added commitments to the revised EA. Refer to revised EA, Chapter V, Section R for details.</p> <p>13. The floodplain assessment for the Project took into consideration the direct and indirect effects to the Project study area and surrounding areas include Southbridge. The analysis found that the risks associated with Project encroachment into the floodplain are minimal. The Project includes fill to raise the transportation infrastructure 18 inches above the 100-year floodplain in accordance with City of Wilmington floodplain development code. In other words, the elevation of the new infrastructure would no longer be in the base floodplain, and not subject to flooding during the 100-year storm. The Project would support base floodplain development and per City code, the development would also be elevated 18 inches above the 100-year floodplain and not subject to flooding during a 100-year storm. Elevating development parcels by 18 inches above the 100-year floodplain base flood elevation without any increases in other base floodplain elevation in the vicinity would reduce flood risk.</p>
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					<p>Indirect effects from the Build Alternative to floodplains are anticipated to be negligible. The transportation infrastructure improvements proposed under the Build Alternative incorporate strategic resiliency solutions. The floodplain effect modeling included proposed development adjacent to the transportation infrastructure and found that the proposed development would not affect 100-year floodplain elevations.</p> <p>The Project would align with the vision and recommendations set out in the 2022 Resilient Wilmington: Preparing Today for Tomorrow’s Climate Risks. The proposed Project and future redevelopment would exceed City regulations that require the lowest floor of new buildings constructed in the floodplain to be at or above base flood elevation plus 18 inches and would incorporate other recommendations for waterfront development as described in Resilient Wilmington. The incremental effect of the Build Alternative to floodplains, in light of past, present, and future effects, is expected to be relatively minimal due to existing regulatory controls and regulations, as well as an increased focus by the City of Wilmington to plan for and address the future effects of climate change. Therefore, as described here and as documented throughout this EA, the Project does not support incompatible development.</p> <p>The City will commit to funding and construction of the South Wilmington Sewer Separation project that includes construction of a separate storm drain system and partial sanitary sewer reconstruction along B and C Streets to help alleviate flooding in the Southbridge community</p> <p>14. Direct effects to surface waters would be minimized in accordance with the Delaware 5101 Sediment and Stormwater Regulations. Per these regulations (Sections 5.6.2.1 and 5.3.3.3), the quality and quantity requirement are met through brownfield remediation and conveyance structure use best management practices (BMPs).</p> <p>As detailed in the remedial action plans, two feet of clean fill cap will be used to prevent contaminated soil erosion and human contact in the transportation improvement area. Hazardous material testing requirements would ensure that the clean fill used during construction is not contaminated. A closed storm drain network will be used for the non-erosive conveyance. Excavation associated with stormwater facilities with vertical depth is discouraged within brownfield sites due to the underlying contaminated soils.</p>
25	Julie	Pezzner	Written Comment Form	<p>I am hoping that the Christina Landing side of River has more townhouses restaurants, docks for public boats, parks, shops, entertainment facilities. The riverfront needs more permanent resident homes, not just apartments and hotels but all are desired. Outdoor concert venues, bars</p>	<p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington’s Comprehensive Master Plan and South Market Street Master Plan. See Chapter V, Section A of the Draft EA and Revised EA for additional discussion regarding the Project’s land use and zoning.</p> <p>The City of Wilmington’s Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington’s boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities.</p>
26	William	Porter	Online Comment Form	<p>This project is a wonderful opportunity to make a meaningful and enduring impact for 10,000's of residents and visitors. My wife and I are investigating moving to the Wilmington area and I look forward to becoming involved in the local events and impactful projects.</p>	<p>Thank you for your comment. Your support of the Project is noted.</p>



27	Marie	Reed	Online Comment Form	<p>Im a Southbridge Resident</p> <p>Id like to be kept informed</p>	<p>Thank you for your comment. Your contact information will be added to the Project email list for future notifications and updates.</p>
28	Caitlin	Salomon	Online Comment Form	<p>Overall, the proposal seems beneficial to the residents of the surrounding community, as it mitigates the risk of contaminated soils, addresses the floodplain concerns, revitalizes brownfields, and offers greater access to other areas of the Riverfront. That being said, I think this project misleadingly decontextualizes its relationship to the Riverfront East development plans. If the project were to only build recreational pathways that would likely increase potential surface runoff (and even then, could they be built with permeable materials to reduce runoff?) and eliminate a small portion of existing wetlands, then that would be unfortunate, but not totally detrimental. I believe most of the community would be in favor of the isolated transportation project, despite its misleading claims. For instance, the project claims to increase the viability of minority communities utilizing bicycles or walking to get to work, despite the data that shows that the majority of people in the area use a car to commute, and not a single respondent claimed to use a bicycle. It thus seems unlikely that a wave of low-income community members will purchase bicycles solely to use these boardwalks, making the report’s claims of promoting these methods of transportation dubious at best. That being said, the new transportation routes will seemingly be helpful to no-car communities at greatest socioeconomic disadvantage and the plans will create much needed greenspaces and neutralize hazardous environments.</p> <p>However, given that the larger vision for this region seems to be replicating the current Riverfront model of mixed residential and commercial venues--which cater to clientele that are certainly NOT represented in the present surrounding neighborhoods as outlined in the Appendix--the alleged "minimal" EJ effects are blatantly untrue. For instance, the projected analysis of population in Appendix J indicates that there is expected growth of 26-100%, but no expected change in employment levels (and likely a decrease at that), despite repeated insistence in the materials that this new region will “create approximately 200 construction-related jobs” (Appendix J, pg. 32). It seems, then, that this influx of people will not be able work in the community they live in, which again defeats the purpose of “walking and biking to work” that the transportation project claims as a goal. With the potential addition of new residential structures, retail shops, and office spaces, property values in the outlying communities will likely rise, destabilizing surrounding minority communities that have renter populations that far exceed national averages (Appendix B). Appendix J admits openly to the possibility of these communities being priced out of their neighborhoods yet speaks of this reality only in hypotheticals. Essentially, it seems the transportation infrastructure project is the first step in "revitalizing" AKA gentrifying this side of the Christina River. Divorced from the Riverfront East development, the project is admirable. But even if the construction does mitigate long-standing environmental hazards and promote connectivity to other areas of the riverfront, long-term it will do so at the expense of the EJ populations it alleges to benefit.</p>	<p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington’s Comprehensive Master Plan and South Market Street Master Plan. The City of Wilmington’s Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington’s boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities. See Chapter V, Section A of the Draft EA and Revised EA for additional discussion regarding the Project’s land use and zoning.</p> <p>The purpose of the Project is to provide transportation infrastructure to further the connectivity of the riverfront area and provide multi-modal resources. While plans for development have not been finalized, future land redevelopment is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities. Additionally, the Project may potentially result in increased property values as an indirect effect from the Project, but the specific effects to the surrounding communities, including to Environmental Justice (EJ) populations near the Project study area, are not known at this time. It is also unknown whether affordable housing would be provided as part of planned future development.</p> <p>The City will commit to supporting businesses that qualify for the Office of Economic Development's Strategic Fund set-aside for minority owned businesses. Provide notices to the Southbridge Civic Association for business development events hosted by the Office of Economic Development and economic development partners such as the Small Business Administration, Small Business Development Center, Delaware Division of Small Business, and Community Development Financial Institutions. The City and RDC will commit to advertising and holding outreach events for construction workforce opportunities in nearby disadvantaged neighborhoods.</p>

29	Otis	Scrivens	Online Comment Form	<p>The Riverfront Transportation Environmental Assessment was well done! I just wanted to see a small Marena. Can we look to see if there are options for access to recreational activities? I can't wait to see the start of construction. .. Very exciting!</p> <p>Thank you!</p>	<p>Thank you for your comment. Your support of the Project is noted.</p> <p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington’s Comprehensive Master Plan and South Market Street Master Plan.</p> <p>The City of Wilmington’s Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington’s boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities.</p>
30	Michael	Skros	Online Comment Form	<p>I am writing in strong support of the Wilmington Riverfront Transportation Infrastructure Project. As a resident of one of the new apartment complexes along the Riverfront, I understand how this development will drastically improve the surrounding area. This infrastructure investment will attract new people and businesses -- raising both the tax base and quality of living in the City of Wilmington. Riverfront East is prime real estate and should be put to good use with mixed-use development and recreation. This infrastructure project is a necessary next step in re-invigorating the Riverfront and the City of Wilmington.</p>	<p>Thank you for your comment. Your support of the Project is noted.</p> <p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington’s Comprehensive Master Plan and South Market Street Master Plan. See Chapter V, Section A of the Draft EA and Revised EA for additional discussion regarding the Project’s land use and zoning.</p> <p>The City of Wilmington’s Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington’s boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities.</p>
31	Paul	Stoffer	Online Comment Form	<p>what will impact on christina landing</p>	<p>Thank you for your comment. The community of Christina Landing is outside the Project Study Area. However, the community is adjacent to South Market Street east of the Project Study Area; therefore, the community could experience temporary construction impacts. (Refer to Chapter III, Section B.1 for details.) It is anticipated that trucks traveling to and from the Project study area during construction would access the area via the I-495, US Business 13 / South Market Street, and Judy Johnson Drive. The construction plan would detail the construction of the main north-south spine road through the Project study area first, currently identified as Orange Street which will be used as a temporary construction haul road. Construction trucks and vehicles would access Orange Street from Judy Johnson Drive, travel through the site, and exit via South Market Street. This approach would limit the construction-related traffic to existing regional roadways and minimize Project-related construction traffic traveling through adjacent residential communities.</p>



32	Jeffrey	Taviano	Online Comment Form	<p>The Wilmington Riverfront is the perfect place to help grow the Wilmington economy. The old piers could be rebuilt into fishing piers, or docks for the river taxi.</p> <p>The only concern is to do it correctly. The Christina Riverfront is a vital environment for striped bass. The river is already severely polluted. Please take the necessary steps to prevent further pollution from ground sediments and storm/wastewater runoff.</p> <p>Massachusetts cleaned the Charles River from one of the most polluted rivers in the country. It's now swimmable.</p> <p>Delaware should do the same. Raising littering fines to \$10,000 like Massachusetts would greatly help.</p>	<p>Thank you for your comment. This is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project.</p> <p>The direct effects from the Project's transportation infrastructure improvements are anticipated to be beneficial, such as approximately 200 construction-related jobs and better access to jobs. The City will commit to supporting businesses that qualify for the Office of Economic Development's Strategic Fund set-aside for minority owned businesses as well as providing notices to the Southbridge Civic Association for business development events hosted by the Office of Economic Development and economic development partners such as the Small Business Administration, Small Business Development Center, Delaware Division of Small Business, and Community Development Financial Institutions. The City and RDC will also commit to advertising and holding outreach events for construction workforce opportunities in nearby disadvantaged neighborhoods.</p> <p>Direct effects to surface waters would be minimized in accordance with the Delaware 5101 Sediment and Stormwater Regulations. Per these regulations (Sections 5.6.2.1 and 5.3.3.3), the quality and quantity requirements are met through brownfield remediation and conveyance structure use best management practices (BMPs).</p> <p>As detailed in the remedial action plans, two feet of clean fill cap will be used to prevent contaminated soil erosion and human contact in the transportation improvement area. Hazardous material testing requirements would ensure that the clean fill used during construction is not contaminated. A closed storm drain network will be used for the non-erosive conveyance. Excavation associated with stormwater facilities with vertical depth is discouraged within brownfield sites due to the underlying contaminated soils. Refer to the Chapter V, Sections L and M and Appendix I for additional details on the water quality protections for the Project.</p>
33	Tom	Urso	Online Comment Form	<p>To address flooding, create a wetlands around the riverfront</p>	<p>Direct impacts to wetlands and waters associated with construction of the Build Alternative include grading, riprap installation, and construction-related access. During Final Design, the Project team will work with US Army Corps of Engineers (USACE) and the Delaware Department of Natural Resources and Environmental Control (DNREC) while obtaining the Federal and state permits to determine the loss versus impact resulting from the Project activities and to identify appropriate mitigation for losses to the waterways and wetlands. To the extent that mitigation is required by Section 404 of the Clean Water Act, the Project would provide onsite mitigation to restore degraded tidal wetlands. The initial compensatory mitigation approach would be to enhance phragmites dominated tidal wetlands, on-site, along the Project shoreline. If compensatory mitigation is needed, the plans will be developed as required by Federal and state regulations and would comply with the requirements included in the 2008 mitigation rule, including provision for long-term management, adaptive management, and site protection. The permit applicant would be responsible for executing wetland and water mitigation requirements concurrent with Project construction, monitoring mitigation success, and long-term management of the mitigation sites in accordance with state and Federal permit conditions. The condition of wetlands that would undergo temporary impacts will be assessed prior to construction and following construction, temporarily impacted wetlands will be restored, if needed, according to the special conditions of the Federal and state permits.</p>

34	Lynn	Weisbord	Verbal Testimony	<p>My two concerns lumped into one. One is the traffic going over that bridge right past the River Tower, the speed of the cars, the fact that two people have already been hit and there was a major accident about a week ago where they actually went up a tree and hit the garage. I'm concerned that somebody will get killed eventually there. I walk my granddaughter there in the stroller to go to the museum, and it's a very frightening situation to do that. The second one is about the speed of the bikers on the Riverfront. Even on Sunday when it's extremely crowded, they are weaving in and out of people with dogs, and they do not slow down, and that's another concern I have. This Sunday the guy got so close to me; I felt a whoosh when he went by me. He was pretty close. So those are my two issues.</p>	<p>As part of the development of the South Market Street Master Plan a traffic study was conducted in 2021. Refer to Appendix A for the South Market Street Redevelopment Master Planning Traffic Operation Analysis Report. This analysis informed the traffic and transportation improvements needed in the Project study area.</p> <p>The proposed roadway grid under the Build Alternative considers major circulation movements, creating three east-west and evenly spaced signalized movements across South Market Street, and connecting the major north-south Market Street and Walnut Street corridors to Orange Street within the limits of the Project study area. The traffic analysis informed the need for three new traffic lights on South Market Street from north to south: at A Street, Howard Street, and Jones Street.</p> <p>It is anticipated that trucks traveling to and from the Project study area during construction would access the area via the I-495, US Business 13 / South Market Street, and Judy Johnson Drive. The construction plan would detail the construction of the main north-south spine road through the Project study area first, currently identified as Orange Street which will be used as a temporary construction haul road (Figure 2). Construction trucks and vehicles would access Orange Street from Judy Johnson Drive, travel through the site, and exit via South Market Street. This approach would limit the construction-related traffic to existing regional roadways and minimize Project-related construction traffic traveling through adjacent residential communities.</p> <p>The proposed bicycle and pedestrian infrastructure under the Build Alternative will help improve safety, connectivity, and mobility. The City and RDC will coordinate with the Delaware Department of Transportation (DelDOT) on any improvements needed on South Market Street.</p>
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35	Charlie	Weymouth (Weymouth Architects and Planners)	Email	<p>Wilmington based Architect Charlie Weymouth, AIA Emeritus, having earlier provided written response/comment to subject body, additionally of recent reviewed the YIMBY Philadelphia-2021,2023 released overall plan/concepts of May <b>2021</b>, and attended/reviewed boards on site April 15, 2024 FedHighwayAdmin.presentation, submits comment:</p> <p><b>That proposed should be rejected outright.</b></p> <ul style="list-style-type: none"> <li>•Fragmented in presentation, absent is the substantive body of intended building masses, set backs-earlier declarations of densities, character, sizes, etc.</li> <li>•1st sequence of presented documents are in substance contrary to fact:</li> </ul> <p>“ No significant impact “--- There is drastic and negative impact  “ Flood Plain Approval”---- By Whom ?—There is continued/historic flooding to the site-tidal water effect, Bldgs. 16” above desig. 100 yr. Flood plain-totally inadequate.  Flood water disbursement to adjoining properties and to S. Market St.  “ Existing Moderate traffic”--An absurd statement-The multiple ingress/egress for this Site disablesthe MAIN South Wilmington City Highway exit.  * Only one displaced business”- Displacement of major businesses has been ongoing for in excess ofeight years with this focus for housing re development.</p> <p>The Public, if informed, will take corrective action to stop the selective Developer emitting vacuous promises of improved economy, employment for the under employed, and continued availability of funds from the National Treasury. Historically, and applicable to the local Water fronts, intercession into the 2nd World War raised us nearly out of the Great Depression, only to impart within twenty years following the end, a waterfront of deserted buildings and a vast of under employed. As proposed pre War for the North Bank of the Christina, a revised Landscape Plan dating from 1938, a proposed cultural/passive recreational vista was envisioned. Applicable to the now extended South Bank-West? The all volunteer local Architects in their 2004 Plan were commanded to retain the subject site being un designated—(retaining two of those last Supply and Distribution facilities.)Weymouth Architects and Planners, a 53 year practice, have jointly participated inat least three City of Wilmington Master Plans, presided over a fourth Metropolitan City/County Plan.</p>	<p>The focus of the Wilmington Riverfront Transportation Infrastructure Project is to construct transportation infrastructure improvements for the South Market Street Riverfront East area of the City. The Build Alternative proposes an expanded road network branching from South Market Street towards the Christina River and replicating the downtown Wilmington grid system in the Project study area. Infrastructure improvements are proposed to create continuity of intersection type/spacing and provide key points of access into the Project study area.</p> <p>As part of the development of the South Market Street Master Plan a traffic study was conducted in 2021. Refer to Appendix A for the South Market Street Redevelopment Master Planning Traffic Operation Analysis Report. This analysis informed the traffic and transportation improvements needed in the Project study area.</p> <p>The proposed street grid is a balance of defining buildable parcels as well as appropriate infrastructure access for vehicles (local, commuter, public transportation), pedestrians, and bicyclists and will include on street parking (EA, Figure 2). The proposed grid considers major circulation movements, creating three east-west and evenly spaced signalized movements across South Market Street, and connecting the major north-south Market Street and Walnut Street corridors to Orange Street within the limits of the Project study area (from north to south: at A Street, Howard Street, and Jones Street).</p> <p>The transportation infrastructure improvements under the Build Alternative also incorporate strategic resiliency solutions to environmental challenges currently faced by the site. The Project study area is expected to be entirely inundated in the case of a 100-year flood event under its current condition. The Build Alternative proposes to elevate the transportation elements in compliance with the Federal Emergency Management Agency (FEMA) Floodplain Regulations to protect the site from inundation and flood-related damage. While the existing South Market Street roadway would remain at its existing elevation below the 100-year flood event, all other proposed roads would be constructed at elevations above the 100-year flood event except where they would connect to existing streets at lower elevations. Additionally, proposed sidewalks and the Riverwalk would also be at elevations above the 100-year flood event. These Project elements are aligned with the City of Wilmington’s strategies<sup>1</sup> to harden infrastructure vulnerable to sea level rise and extreme weather events.</p>
36	Brad	Williams	Online Comment Form	<p>Too late. The place is a mess. Always has been. People trash the streets,parking lots even their own homes. Companies like du Pont have done their part too.</p>	<p>Thank you for your comment.</p>

<sup>1</sup> <https://www.wilmingtonde.gov/government/city-departments/public-works/resilient-wilmington>

37	Bartholomew	Wilson	Online Comment Form	<p>The Environmental assessment as it is written and presented focuses on the contamination capping and infrastructure. The effects on this on the environment and neighboring community are narrowly focused in the discussion, where it is stated that no negative impact will be experienced, and no mitigation is needed. It becomes clear upon review that the actions proposed are limited in this assessment and the focus is the infrastructure. The development that would result from building the roads in not being adequately included into the assessment of the impacts on the environment and community. An Environmental Assessment is supposed to look at the cumulative impacts of the Federal Highways Administration (FHWA) funding and actions, and as the development is tied to the infrastructure then it all needs to be included in detail of the assessment. In this assessment, road infrastructure on its own will not impact the surrounding underserved communities (i.e. Southbridge) for the most part, but the development of the area will heavily impact on the community through gentrification and creating a further break in the southbridge landscape. The development, as it seems, will focus on larger buildings with retail (at ground level) with commercial and residential space above them. This extension of downtown Wilmington is not designed to support lower income underserved neighborhoods and communities next to this area. This development is focused on higher income residents. The further displacement of the neighboring community is apparent, as this plan does not mention that the only supermarket in walking distance to the community will be demolished and replaced with retail stores and residential space. The EA mentions only one business will be impacted (a gas station) and this illustrates that the focus is the impact of the infrastructure, not the true cumulative impacts of the entire project and federal action. This entire EA is intentionally bias in how it assesses the impacts, and a fair assessment on the community is not occurring. The EA is not allowing the community to understand and comment on the larger (cumulative) impact of the infrastructure and development impacts and the overall effects. The further development will be done in a fashion where community input and review will be minimized or focused on smaller pieces. The true impact and mitigation needs will never be truly determined as the process is proceeding currently.</p> <p>All wetland impacts should require mitigation on site, or within southbridge. No wetland mitigations should be allowed outside of the Southbridge area. Mitigation should not be allowed outside of the project area, the impacts should be mitigated within the project areas. The community of Southbridge is taking on the cumulative impacts of the project (i.e. infrastructure and resulting development) so all mitigation should be required within the project area and Southbridge.</p> <p>In review of the EA, there are major concerns related to validity and appropriateness of the modeling conducted to assess flooding that could result from this project. In order to construct and then apply a hydrodynamic modeling that is then used to assess changes in flooding, significant amount of physical data is necessary to construct a model that has sufficient precision to assess the impacts. No tidal data was collected within the study area, even with 6 tidal restrictions (bridges). The only water level data that is mentioned is outside the study area, with two in the Delaware River. In addition, no velocity data was collected to again to understand the local hydrodynamics of the system. The resolution, date, and messing of the bathymetry and elevation data for the study area is also not mentioned. All these parameters are significant in developing a model that has sufficient precision to assess how the project can effect the flooding regime in the community. Poor bathymetry and local of local water-levels are major issues that would negate the findings of the EA. The model that was used was a scour model, which also throws into question the validity of the findings. A model was used that was from past work, which can speed up the process, but in this case</p>	<p>Thank you for your comment. The purpose of the Project is to provide transportation infrastructure to further the connectivity of the riverfront area and provide multi-modal resources. See Chapter II of the Draft EA and Revised EA for additional discussion regarding the Project’s purpose and need. The Proposed Action would an expanded the road network branching from South Market Street towards the Christina River and replicating the downtown Wilmington grid system in the Project study area. Infrastructure improvements are proposed to create continuity of intersection type/spacing and provide key points of access into the Project study area. The proposed street grid is a balance of defining buildable parcels as well as appropriate infrastructure access for vehicles (local, commuter, public transportation), pedestrians, and bicyclists and will include on street parking.</p> <p>As required by NEPA, effects or impacts, including direct, indirect, and cumulative effects to the human environment from the proposed Build Alternative that are reasonably foreseeable were disclosed (Appendix J). The Project’s indirect and cumulative effects analysis was conducted in accordance with NEPA and its implementing CEQ regulations. To assess indirect and cumulative effects, an analysis area boundary was developed by synthesizing sub-boundaries, including watersheds, Census tracts, and the City of Wilmington Neighborhood Analysis Areas, to cover a geographic area large enough to ensure that all reasonably foreseeable indirect and cumulative effects were adequately captured in this analysis. The Southbridge Community was included within the indirect and cumulative effects analysis area boundary for this Project. For additional information on the methodology, approach, and analysis area used to assess indirect and cumulative effects for this Project, refer to the <i>Indirect and Cumulative Effects Technical Report</i> (Appendix J).</p> <p>Direct impacts to wetlands and waters associated with construction of the Build Alternative include grading, riprap installation, and construction-related access. During Final Design, the Project team will work with USACE and DNREC while obtaining the Federal and state permits to determine the loss versus impact resulting from the Project activities and to identify appropriate mitigation for losses to the waterways and wetlands. To the extent that mitigation is required by Section 404 of the Clean Water Act, the Project would provide onsite mitigation to restore degraded tidal wetlands. The initial compensatory mitigation approach would be to enhance phragmites dominated tidal wetlands, on-site, along the Project shoreline. If compensatory mitigation is needed, the plans will be developed as required by Federal and state regulations and would comply with the requirements included in the 2008 mitigation rule, including provision for long-term management, adaptive management, and site protection. The permit applicant would be responsible for executing wetland and water mitigation requirements concurrent with Project construction, monitoring mitigation success, and long-term management of the mitigation sites in accordance with state and Federal permit conditions. The condition of wetlands that would undergo temporary impacts will be assessed prior to construction and following construction, temporarily impacted wetlands will be restored, if needed, according to the special conditions of the Federal and state permits.</p> <p>Consideration of floodplain impacts resulting from the Project was conducted and documented in Section N of the Draft and Final EA as well as in greater detail in Appendix I. Any actions (including construction) in base floodplains (i.e., 100-year floodplain) must comply with FHWA’s regulation 23 CFR 650 Subpart A. 23 CFR 650 Subpart A prescribes FHWA policies and procedures for the location and hydraulic design of highway encroachments in floodplains. 23 CFR 650 Subpart A includes the FHWA policy of avoiding longitudinal and significant encroachment into the floodplain and minimizing adverse impacts to base floodplains while</p>
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<p>38</p>	<p>Kerry</p>	<p>Wilson</p>	<p>Online Comment Form</p>	<p>Onsite mitigation for wetland impacts or losses must be mitigated with a priority on (option A) onsite mitigation (option B) mitigation within Southbridge. No mitigation should be allowed outside the greater project/Southbridge area.</p> <p>2D modelling scour and drainage analysis report Appendix B FEMA data is not readable.</p> <p>It does not appear that site specific water level or velocity was collected within the study area to build a more robust model. Is this the case and if so, why not? Having more accurate data for the study site would make model results more realistic. Also, what was the state of the bathymetry data that was used since bathymetry has a major role in hydrodynamic model results. If the model is based on boundary condition assumptions that are farther away from the project area the overall flooding could appear to be underrepresented. Were any of the flood results in this model validated with water mark data within the communities to assess the over validity of the model?</p> <p>Without existing water level data in the system there are six bridges (South Walnut, Judy Johnson Drive, 4th street, South Market and two railroad) that are tidal restrictions that should have site specific water level data to assess their impact. Do you have this data?</p> <p>Modelling should be more comprehensive to look at increased impervious surfaces and existing flood protections (and potential future flood protection expansions) on the riverfront and how that will impact Southbridge.</p> <p>What is the absolute elevation of the project area?</p> <p>Within building a flood protection island, are there flood mitigation strategies for surrounding communities that remain at lower elevations?</p> <p>Is it true that the stormwater that is collected would be discharged into the Christina River untreated?</p> <p>It is stated in the hydrology discussions there will be capping and use of impervious surface to collect surface water to reduce infiltration but when discussing stormwater runoff, it is stated there is a reduction of impervious area which will reduce the amount of stormwater runoff these two statements seem to contradict each other. It is further stated in table 13 that the build alternative effects under watersheds and surface water there will be an overall increase in impervious surface and amount and intensity of surface water runoff. Can you provide clarification?</p>	<p>Direct impacts to wetlands and waters associated with construction of the Build Alternative include grading, riprap installation, and construction-related access. During Final Design, the Project team will work with USACE and DNREC while obtaining the Federal and state permits to determine the loss versus impact resulting from the Project activities and to identify appropriate mitigation for losses to the waterways and wetlands. To the extent that mitigation is required by Section 404 of the Clean Water Act, the Project would provide onsite mitigation to restore degraded tidal wetlands. The initial compensatory mitigation approach would be to enhance phragmites dominated tidal wetlands, on-site, along the Project shoreline. If compensatory mitigation is needed, the plans will be developed as required by Federal and state regulations and would comply with the requirements included in the 2008 mitigation rule, including provision for long-term management, adaptive management, and site protection. The permit applicant would be responsible for executing wetland and water mitigation requirements concurrent with Project construction, monitoring mitigation success, and long-term management of the mitigation sites in accordance with state and Federal permit conditions. The condition of wetlands that would undergo temporary impacts will be assessed prior to construction and following construction, temporarily impacted wetlands will be restored, if needed, according to the special conditions of the Federal and state permits.</p> <p>Mean Low Water (MLW) and Mean High Water (MHW) elevations are based on published data from the two closest NOAA tide stations and are therefore representative of anticipated site conditions. The FEMA tidal stillwater elevations and discharges used for the modeling are site-specific and are therefore representative of anticipated site conditions too.</p> <p>The bathymetry data used in the modeling was based on hydrographic survey data collected by Army Corps of Engineers in 2022 for the Christina River and supplemented with bathymetric data collected during previous project efforts near the Wilmington waterfront.</p> <p>The boundary conditions established for the 2D Modeling were set sufficiently far enough away from the Project study area to reduce their influence on results in the project area as the boundary conditions are locations of the highest uncertainty in models. Refer to Figure 4, 2D Modeling Domain of the Appendix E of the Natural Resources Technical Report for the area modeled which included the Southbridge Community. Sensitivity of simulation time for the riverine scenarios was preformed to ensure that there was not significant attenuation/reduction of discharges within the Project study area which would lead to overall flooding appearing to be underrepresented. Similarly, velocities and water surface elevation for the tidal scenario were selected at specific modeling time steps so that water surface elevations of the storm events in the vicinity of the project area were comparable to that of the FEMA stillwater elevations.</p> <p>Calibration to specific high-water mark was not completed and not required to compare existing versus proposed conditions while holding all other variables constant as high-water marks are unique to specific storm events.</p> <p>The six bridges experience varying water surface elevations depending on each unique storm event and point in the tidal cycle. To evaluate potential impacts of the proposed conditions, these bridges were analyzed over a wide range of water surface elevations covered by the three hydrologic scenarios modeled. Since the MLW, MHW, and tidal stillwater elevations are based on NOAA and FEMA published values for the project area, the modeled conditions are representative anticipated site conditions.</p>
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39	Russel	Zerbo	Email	<p>Comments on the Federal Highway Administration's Wilmington Riverfront Transportation Infrastructure Project are due Wednesday, May 1st (tomorrow). This is the proposal <a href="https://www.riverfronteastconnect.com/wp-content/uploads/2024/03/Wilmington_Draft-EA_03.29.24_web.pdf">https://www.riverfronteastconnect.com/wp-content/uploads/2024/03/Wilmington_Draft-EA_03.29.24_web.pdf</a> This is the form to comment: <a href="https://www.riverfronteastconnect.com/eacommentform/">https://www.riverfronteastconnect.com/eacommentform/</a> This is a suggested comment I put together that focuses on extending the comment period, engaging Southbridge residents, and preventing future flooding</p> <p>Draft Comment: Please extend the public comment period for the draft environmental assessment regarding the Wilmington Riverfront Transportation Infrastructure Project to at least May 31st. Please also schedule an additional public meeting in the Southbridge neighborhood of South Wilmington so that the current residents most impacted by this proposal can provide meaningful comments that will be thoughtfully considered by the Federal Highway Administration (FHA), the City of Wilmington, and the Riverfront Development Corporation (RDC).</p> <p>Please focus this additional public meeting in the Southbridge neighborhood of South Wilmington on the potential flooding impacts of this project. Southbridge is uniquely impacted by tidal flooding compounded by large precipitation events. This proposal must consider how significant rainfall and high tide events, compounded by increased stormwater because of expanded development, could collectively flood Southbridge. Even if all stormwater collected in this project's impact area is directed into the Christiana River, this could still increase the chance of flooding in Southbridge. This risk increases as precipitation and sea level rise increase over time because of climate change.</p> <p>The draft environmental assessment proposes to raise the project area out of the 100-year floodplain. Currently, the entire project area is located within the 100-year floodplain, as is the vast majority of Southbridge. In order to reduce the likelihood that this project will increase flooding in surrounding areas, stormwater management must go beyond raising the site and must include infrastructure that will absorb water, and not just discharge it into the Christiana River. To that end, the riverwalk and open space areas in the current proposal must be expanded.</p>	<p>The Draft Environmental Assessment was published on April 1, 2024 and was available for public review and comment through May 1, 2024, consistent with 23 CFR § 771.119(d). In response to public comments requesting an extension of the comment period, FHWA provided a 15-day extension. The Draft EA comment period ended on May 15, 2024.</p> <p>Addressing public comments, a community outreach meeting was held in-person at the Neighborhood House community center in the Southbridge neighborhood on May 9, 2024, from 6 – 7 p.m. This meeting was advertised through the Environmental Justice (EJ) organization email list, and flyers distributed notifying the public of the comment period extension and community outreach meeting were provided to community centers in the area, including the Neighborhood House, Rose Hill Community Center, Latin American Community Center, MSK Community Center, the Route 9 Library and Innovation Center, and the Chase Center at the Riverfront. Finally, flyers were posted on community bulletin boards located within the ShopRite of Christina Crossing.</p> <p>This community outreach meeting was held in response to public comments requesting a meeting be held in the Southbridge neighborhood, east of the Project study area. Eleven attendees were present at the meeting, including Southbridge residents, members of the Southbridge Civic Association, Southbridge Community Development Corporation, and South Wilmington Planning Network (SWPN). Informational display boards from the in-person public hearing were available for viewing at the community outreach meeting, with the Project Team present to answer questions about the proposed project. Attendees were encouraged to fill out a written comment form at the community outreach meeting, or to provide comments through the online comment form, email, or voicemail in order for their concerns to be addressed in the Revised EA. In response to the public feedback, the City has added commitments to the revised EA. Refer to revised EA, Chapter V, Section R for details.</p> <p>The floodplain assessment for the Project took into consideration the direct and indirect effects to the Project study area and surrounding areas include Southbridge. The analysis found that the risks associated with Project encroachment into the floodplain are minimal. The Project includes fill to raise the transportation infrastructure 18 inches above the 100-year floodplain in accordance with City of Wilmington floodplain development code. In other words, the elevation of the new infrastructure would no longer be in the base floodplain, and not subject to flooding during the 100-year storm. The Project would support base floodplain development and per City code, the development would also be elevated 18 inches above the 100-year floodplain and not subject to flooding during a 100-year storm. Elevating development parcels by 18 inches above the 100-year floodplain base flood elevation without any increases in other base floodplain elevation in the vicinity would reduce flood risk.</p> <p>Indirect effects from the Build Alternative to floodplains are anticipated to be negligible. The transportation infrastructure improvements proposed under the Build Alternative incorporate strategic resiliency solutions. The floodplain effect modeling included proposed development adjacent to the transportation infrastructure and found that the proposed development would not affect 100-year floodplain elevations.</p> <p>The Project would align with the vision and recommendations set out in the 2022 Resilient Wilmington: Preparing Today for Tomorrow's Climate Risks. The proposed Project and future redevelopment would exceed City regulations that require the lowest floor of new buildings constructed in the floodplain to be at or above base flood elevation plus 18 inches and would incorporate other recommendations for waterfront development as described in Resilient</p>
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					<p>Wilmington. The incremental effect of the Build Alternative to floodplains, in light of past, present, and future effects, is expected to be relatively minimal due to existing regulatory controls and regulations, as well as an increased focus by the City of Wilmington to plan for and address the future effects of climate change. Therefore, as described here and as documented throughout this EA, the Project does not support incompatible development.</p> <p>The City will commit to funding and construction of the South Wilmington Sewer Separation project that includes construction of a separate storm drain system and partial sanitary sewer reconstruction along B and C Streets to help alleviate flooding in the Southbridge community. Direct effects to surface waters would be minimized in accordance with the Delaware 5101 Sediment and Stormwater Regulations. Per these regulations (Sections 5.6.2.1 and 5.3.3.3), the quality and quantity requirements are met through brownfield remediation and conveyance structure use best management practices (BMPs).</p> <p>As detailed in the remedial action plans, two feet of clean fill cap will be used to prevent contaminated soil erosion and human contact in the transportation improvement area. Hazardous material testing requirements would ensure that the clean fill used during construction is not contaminated. A closed storm drain network will be used for the non-erosive conveyance. Excavation associated with stormwater facilities with vertical depth is discouraged within brownfield sites due to the underlying contaminated soils. Refer to the Chapter V, Sections L and M and Appendix I for additional details on the water quality protections for the Project.</p>
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40	Russel	Zerbo	Online Comment Form	<p>Please extend the public comment period for the draft environmental assessment regarding the Wilmington Riverfront Transportation Infrastructure Project to at least May 31st. Please also schedule an additional public meeting in the Southbridge neighborhood of South Wilmington so that the current residents most impacted by this proposal can provide meaningful comments that will be thoughtfully considered by the Federal Highway Administration (FHA), the City of Wilmington, and the Riverfront Development Corporation (RDC).</p> <p>Please focus this additional public meeting in the Southbridge neighborhood of South Wilmington on the potential flooding impacts of this project. Southbridge is uniquely impacted by tidal flooding compounded by large precipitation events. This proposal must consider how significant rainfall and high tide events, compounded by increased stormwater because of expanded development, could collectively flood Southbridge. Even if all stormwater collected in this project’s impact area is directed into the Christiana River, this could still increase the chance of flooding in Southbridge. This risk increases as precipitation and sea level rise increase over time because of climate change.</p> <p>The draft environmental assessment proposes to raise the project area out of the 100-year floodplain. Currently, the entire project area is located within the 100-year floodplain, as is the vast majority of Southbridge. In order to reduce the likelihood that this project will increase flooding in surrounding areas, stormwater management must go beyond raising the site and must include infrastructure that will absorb water, and not just discharge it into the Christiana River. To that end, the riverwalk and open space areas in the current proposal must be expanded.</p>	<p>The Draft Environmental Assessment was published on April 1, 2024 and was available for public review and comment through May 1, 2024, consistent with 23 CFR § 771.119(d). In response to public comments requesting an extension of the comment period, FHWA provided a 15-day extension. The Draft EA comment period ended on May 15, 2024.</p> <p>Addressing public comments, a community outreach meeting was held in-person at the Neighborhood House community center in the Southbridge neighborhood on May 9, 2024, from 6 – 7 p.m. This meeting was advertised through the Environmental Justice (EJ) organization email list, and flyers distributed notifying the public of the comment period extension and community outreach meeting were provided to community centers in the area, including the Neighborhood House, Rose Hill Community Center, Latin American Community Center, MSK Community Center, the Route 9 Library and Innovation Center, and the Chase Center at the Riverfront. Finally, flyers were posted on community bulletin boards located within the ShopRite of Christina Crossing.</p> <p>This community outreach meeting was held in response to public comments requesting a meeting be held in the Southbridge neighborhood, east of the Project study area. Eleven attendees were present at the meeting, including Southbridge residents, members of the Southbridge Civic Association, Southbridge Community Development Corporation, and South Wilmington Planning Network (SWPN). Informational display boards from the in-person public hearing were available for viewing at the community outreach meeting, with the Project Team present to answer questions about the proposed project. Attendees were encouraged to fill out a written comment form at the community outreach meeting, or to provide comments through the online comment form, email, or voicemail in order for their concerns to be addressed in the Revised EA. In response to the public feedback, the City has added commitments to the revised EA. Refer to revised EA, Chapter V, Section R for details.</p> <p>The floodplain assessment for the Project took into consideration the direct and indirect effects to the Project study area and surrounding areas include Southbridge. The analysis found that the risks associated with Project encroachment into the floodplain are minimal. The Project includes fill to raise the transportation infrastructure 18 inches above the 100-year floodplain in accordance with City of Wilmington floodplain development code. In other words, the elevation of the new infrastructure would no longer be in the base floodplain, and not subject to flooding during the 100-year storm. The Project would support base floodplain development and per City code, the development would also be elevated 18 inches above the 100-year floodplain and not subject to flooding during a 100-year storm. Elevating development parcels by 18 inches above the 100-year floodplain base flood elevation without any increases in other base floodplain elevation in the vicinity would reduce flood risk.</p> <p>Indirect effects from the Build Alternative to floodplains are anticipated to be negligible. The transportation infrastructure improvements proposed under the Build Alternative incorporate strategic resiliency solutions. The floodplain effect modeling included proposed development adjacent to the transportation infrastructure and found that the proposed development would not affect 100-year floodplain elevations.</p> <p>The Project would align with the vision and recommendations set out in the 2022 Resilient Wilmington: Preparing Today for Tomorrow’s Climate Risks. The proposed Project and future redevelopment would exceed City regulations that require the lowest floor of new buildings constructed in the floodplain to be at or above base flood elevation plus 18 inches and would incorporate other recommendations for waterfront development as described in Resilient</p>
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					<p>Wilmington. The incremental effect of the Build Alternative to floodplains, in light of past, present, and future effects, is expected to be relatively minimal due to existing regulatory controls and regulations, as well as an increased focus by the City of Wilmington to plan for and address the future effects of climate change. Therefore, as described here and as documented throughout this EA, the Project does not support incompatible development.</p> <p>The City will commit to funding and construction of the South Wilmington Sewer Separation project that includes construction of a separate storm drain system and partial sanitary sewer reconstruction along B and C Streets to help alleviate flooding in the Southbridge community. Direct effects to surface waters would be minimized in accordance with the Delaware 5101 Sediment and Stormwater Regulations. Per these regulations (Sections 5.6.2.1 and 5.3.3.3), the quality and quantity requirements are met through brownfield remediation and conveyance structure use best management practices (BMPs).</p> <p>As detailed in the remedial action plans, two feet of clean fill cap will be used to prevent contaminated soil erosion and human contact in the transportation improvement area. Hazardous material testing requirements would ensure that the clean fill used during construction is not contaminated. A closed storm drain network will be used for the non-erosive conveyance. Excavation associated with stormwater facilities with vertical depth is discouraged within brownfield sites due to the underlying contaminated soils. Refer to the Chapter V, Sections L and M and Appendix I for additional details on the water quality protections for the Project.</p>
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<p>41</p>	<p>Southbridge Civic Association</p>	<p>Email and Online Comment Form</p>	<p>I hope this email finds you well. As an active leader in the community, I am writing to bring to your attention some pressing concerns regarding the need for equal investment in the Southbridge community of Wilmington. As one of the city's oldest communities, Southbridge holds a significant historical and cultural heritage that deserves to be preserved and celebrated.</p> <p>It has come to our attention that there appears to be unequal investment between the riverfront area and the Southbridge community. While the riverfront area continues to grow and prosper, Southbridge seems to be left behind. Given Southbridge's rich history as a key location on the historic underground railroad and as Wilmington's first black community, it is crucial that we make efforts to sustain and enhance the neighborhood for future generations.</p> <p>The community is eager to establish a land trust for the purpose of maintaining and increasing homeownership, improving current housing conditions, and beautifying the community. We believe that entering into a Community Benefits Agreement (CBA) with the (EA) and the (RCD) would demonstrate a long-term commitment to reinvesting in Southbridge. Can there be some allocation for infrastructure projects in Southbridge?</p> <p>Furthermore, we seek clarity on the infrastructure being planned for the land in EA. Will it be geared towards commercial or residential development? What are the anticipated start and end dates of the project? It is essential for us to understand how this development will impact the community, particularly in terms of job creation and affordability for residents.</p> <p>In addition, we are concerned about the potential impacts of the proposed development on property values, taxes, and affordability in Southbridge. With a significant number of residents being renters, there is a risk of gentrification and displacement if proper measures are not put in place to protect the community's interests.</p> <p>Moreover, we are apprehensive about the increased traffic flow that may pass through Southbridge as a result of the development. We would appreciate information on how this traffic will be managed, particularly with regards to heavy-duty vehicles such as 18-wheelers and service trucks.</p> <p>Lastly, we would like to inquire about any additional land use applications that future tenants of the project may need to submit. It is important for us to understand the full scope of the development and its implications on the Southbridge community.</p> <p>Thank you for taking the time to address these concerns. We look forward to your response and collaboration in ensuring that Southbridge remains a vibrant and inclusive community for all its residents. Sincerely, Southbridge Civic Association</p>	<p>Thank you for your comment. A Community Benefits Agreement is out of the scope of the Wilmington Riverfront Transportation Infrastructure Project.</p> <p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington’s Comprehensive Master Plan and South Market Street Master Plan. The City of Wilmington’s Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington’s boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities.</p> <p>The Project may potentially result in increased property values as an indirect effect from the Project, but the specific effects to the surrounding communities, including to Environmental Justice (EJ) populations near the Project study area, are not known at this time. It is also unknown whether affordable housing would be provided as part of planned future development.</p> <p>The City and RDC anticipate the construction of the infrastructure improvements proposed in the Build Alternative to take several years to complete. Upon completion of the NEPA process and prior to the start of construction, the City and the RDC would obtain the necessary permits and approvals for the Project (EA, Table 11). After obtaining the necessary permits and approvals, archaeological investigations as described in the Section 106 Project Programmatic Agreement (EA, Appendix H) as applicable and contaminated materials remediation activities will continue concurrently. The Wilmington Riverfront Transportation Infrastructure Project site work will then commence.</p> <p>The proposed roadway grid under the Build Alternative considers major circulation movements, creating three east-west and evenly spaced signalized movements across South Market Street, and connecting the major north-south Market Street and Walnut Street corridors to Orange Street within the limits of the Project study area. The traffic analysis informed the need for three new traffic lights on South Market Street from north to south: at A Street, Howard Street, and Jones Street.</p> <p>It is anticipated that trucks traveling to and from the Project study area during construction would access the area via the I-495, US Business 13 / South Market Street, and Judy Johnson Drive. The construction plan would detail the construction of the main north-south spine road through the Project study area first, currently identified as Orange Street which will be used as a temporary construction haul road (Figure 2). Construction trucks and vehicles would access Orange Street from Judy Johnson Drive, travel through the site, and exit via South Market Street. This approach would limit the construction-related traffic to existing regional roadways and minimize Project-related construction traffic traveling through adjacent residential communities.</p>
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<p>42</p>	<p>Southbridge Community Development Corporation and South Wilmington Planning Network</p>	<p>Email and Online Comment Form</p>	<p>(Re-Sent 5.15.2024) RE: Public Comments - Wilmington Riverfront Transportation Infrastructure Project (EA)</p> <p>Dear Mr. Park,</p> <p>The Southbridge Community Development Corporation and the South Wilmington Planning Network (SWPN) thank you for the opportunity to provide comments on the Wilmington Riverfront Transportation Infrastructure Project. We are writing to reiterate concerns submitted concerning the draft Environmental Assessment (EA) for the Wilmington Riverfront Transportation Infrastructure Project. These points were submitted to the project portal last month and voiced at the April 2024 SWPN meeting.</p> <p>First, the social equity benefits highlighted in the EA (and also the awarded RAISE grant application) are misleading. The project area has been continuously misrepresented as a majority-minority and disadvantaged area due to an overreliance on coarse Census data and a failure to appreciate the diverse nuance of neighborhoods within and around South Wilmington (see Delaware Journal of Public Health, 2022 Aug; 8(3): 78–84). A review of the finer data indicate, majority white, economically-advantaged Riverfront residents (such as those living at Christina Landing and Justison Landing) stand to primarily benefit from the proposed new streets and pathways, along with the new residents who will be attracted to the planned future luxury developments. These residents will likely also be majority white and economically-advantaged.</p> <p>The Riverfront district is surrounded by separate and distinct majority-minority, economically-disadvantaged neighborhoods, such as Browntown and Southbridge. These distinctive neighborhoods share Census tract and block group boundaries with the Riverfront, which muddles the demographic and socio-economic picture for each community. Browntown, the Riverfront, and Southbridge are, however, readily identifiable with Census block and parcel level home price/rent data. This data was not utilized in the draft EA. Places like Southbridge and Browntown will likely see few direct benefits from this project and, as the EA acknowledges, may experience potential harm through increased rents and displacement (aka “a shift of demographics,” property values, and cost of living).</p> <p>Secondly, while we understand that the EA is focused on transportation infrastructure, we are troubled by the impacts the planned future development along this new street grid may have. It is one of the most ambitious development plans in generations in the City of Wilmington, with an estimated 4,000 market rate residences. This planned development was outlined in the 2021 South Market Street Master Plan, and the essential purpose of pursuing this transportation project is to facilitate that plan, which was developed without sufficient public input.</p> <p>The South Market Street Master Plan lacks goals for affordable housing, rent control, minority business ownership, or other mechanisms to offset the gentrification it may generate. There are no direct benefits to nearby disadvantaged neighborhoods; benefits that are generally touted in the draft EA Assessment are assumed, which is common practice when promoting trickle down benefits from brownfield redevelopment and subsequent large-scale development. We outlined preliminary concerns about this Plan during its development in May 2021: <a href="https://swpndotorg.files.wordpress.com/2021/05/final-rdc-s.-market-street-plan-may-2021-signed.pdf">https://swpndotorg.files.wordpress.com/2021/05/final-rdc-s.-market-street-plan-may-2021-signed.pdf</a></p>	<p>Thank you for your comment.</p> <p>The socioeconomic, demographics and Environmental Justice (EJ) analysis for the Project includes use of the latest U.S. Census Bureau data (2021) ACS 2017-2021 5-Year Estimates. Additionally, the EPA’s EJ Screening and Mapping Tool (Version 2.2), referred to as EJSCREEN, for identifying environmental and demographic indicators of EJ populations, as well as the Climate and Economic Justice Screening Tool (CEJST), Version 1.0, were used to identify disadvantaged communities. The WILMAPCO 2019 Transportation Justice Plan further maps where significant and moderate EJ populations are located in New Castle County was also a source used. Throughout the analysis the EJ communities, Southbridge, Browntown, and Hedgeville, were considered in the direct, indirect and cumulative effects assessment. Additional information on EJ communities within the Socioeconomic Study Area can be found in the Socioeconomic Technical Report, Appendix B, Section X.B.</p> <p>Existing and future land use patterns and development goals are identified in the long-term comprehensive and master plans implemented by local governments. Land use conditions within the Project study area were identified through the City of Wilmington’s Comprehensive Master Plan and South Market Street Master Plan. The City of Wilmington’s Comprehensive Master Plan identifies the current zoning in the Project study area as W-4, a waterfront zone. W-4 is defined in the Plan as a waterfront residential commercial district, where medium to high density residential, retail, and office development can take place in the future. The southern end of the Project study area that falls outside of the City of Wilmington’s boundary is defined as heavy industrial by New Castle County. While plans for development have not been finalized, future land redevelopment would be consistent with the City zoning and comprehensive and master plans. The future development is anticipated to bring beneficial indirect effects by providing a mix of uses and community resources that do not currently exist or serve the underutilized Project study area and its surrounding communities. See Chapter V, Section A of the Draft EA and Revised EA for additional discussion regarding the Project’s land use and zoning.</p> <p>The Project may potentially result in increased property values as an indirect effect from the Project, but the specific effects to the surrounding communities, including to Environmental Justice (EJ) populations near the Project study area, are not known at this time. It is also unknown whether affordable housing would be provided as part of planned future development.</p> <p>The proposed conditions floodplain modeling presented in the Draft EA and Appendix I, accounts for increased impervious area, new roadways, and new buildings to accurately estimate changes in water surface elevations, velocities, discharges, and flow patterns. Site specific data, including topographic, bathymetric, and digital elevation data was compiled as part of the modeling effort to most accurately represent existing conditions based on available data. Future flood protection measures can be incorporated into and/or used in conjunction with the hydrodynamic models to evaluate performance and feasibility of specific measures as they are developed.</p> <p>Based on City of Wilmington Code the minimum elevation of proposed infrastructure is 18” above the 100-year FEMA flood elevation of 9.0’. As a result of this, the minimum proposed project elevation is 10.5-feet with the exception of the roadways/sidewalks that tie into adjacent existing facilities.</p>
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While this increase is evident on presented maps, there was also no discussion of any offsets to mitigate that clear burden on a disadvantaged area.</p> <p><b>Workforce:</b> While new construction jobs were emphasized as a workforce benefit of this project, there was no discussion about how these jobs could go to local workers from nearby disadvantaged neighborhoods. Federal policy allows local labor provisions to be added to construction contracts like the one associated with this project.</p> <p><b>Public involvement:</b> We are troubled by the complete absence of references to the Southbridge Neighborhood Action Plan (SNAP) in the draft EA and its disregard of a joint letter, or the points made in it, sent in January 2023 regarding this project:  <a href="https://swpndotorg.files.wordpress.com/2023/03/2.-south-market-street-sbca-swpn-sbcdc-jan-2023.pdf">https://swpndotorg.files.wordpress.com/2023/03/2.-south-market-street-sbca-swpn-sbcdc-jan-2023.pdf</a>.</p> <p>The SNAP discusses the potential impacts of the Riverfront East development at length (and by definition its transportation infrastructure) calling for coordination, cooperation, and support for the Southbridge community. Riverfront East will undoubtedly change the social, economic, and demographic landscape of South Wilmington within the next two to three decades.</p> <p>While we appreciate project staff presenting the draft EA at the April 2024 SWPN meeting, EA staff were in “listening mode” and did not engage with community members and others when questions and points were raised about the project. This is not conducive to overall learning and understanding and further creates a sense of exclusion and alienation that community members in Southbridge may have, relative to the project. We encourage staff to openly discuss project elements rather than holding formal hearings and listening sessions.</p> <p>Finally, while we were encouraged by the statements within the draft EA that speak to supporting implementation of the Southbridge Transportation Action Plan (STAP), we feel there should be direct components of the STAP implemented, not simply a promise to help look for grant funding. In addition, we feel the project should include direct implementation of other project and policy recommendations from the SNAP, such as those outlined in our January 2023 letter. These include the establishment of affordable housing, directly supporting Black and Hispanic-owned business development, and establishing a Tax Increment Financing District to help mitigate displacement of Southbridge residents.</p>	<p>A floodplain approval from the City of Wilmington will be required for the Project during final design. Floodplain applications are reviewed by the Floodplain Administrator, who interprets floodplain boundaries and proposed construction activities to assess impacts and provide approval of the Project. The City of Wilmington has joined the National Flood Insurance Program (NFIP) and adopted local floodplain ordinances that are more restrictive than FEMA requirements. Under the NFIP, the City is responsible for reviewing and approving activities that encroach on the 100-year floodplain. No approving action is required by FEMA unless the activity results in changes to the 100-year floodplain elevation that requires changes to FEMA mapping. In addition, the City will commit to funding and construction of the South Wilmington Sewer Separation project that includes construction of a separate storm drain system and partial sanitary sewer reconstruction along B and C Streets to help alleviate flooding in the Southbridge community.</p> <p>As part of the development of the <i>South Market Street Master Plan</i> a traffic study was conducted in 2021. Refer to Appendix A for the South Market Street Redevelopment Master Planning Traffic Operation Analysis Report. This analysis informed the traffic and transportation improvements needed in the Project study area.</p> <p>The proposed roadway grid under the Build Alternative considers major circulation movements, creating three east-west and evenly spaced signalized movements across South Market Street, and connecting the major north-south Market Street and Walnut Street corridors to Orange Street within the limits of the Project study area. The traffic analysis informed the need for three new traffic lights on South Market Street from north to south: at A Street, Howard Street, and Jones Street.</p> <p>It is anticipated that trucks traveling to and from the Project study area during construction would access the area via the I-495, US Business 13 / South Market Street, and Judy Johnson Drive. The construction plan would detail the construction of the main north-south spine road through the Project study area first, currently identified as Orange Street which will be used as a temporary construction haul road (Figure 2). Construction trucks and vehicles would access Orange Street from Judy Johnson Drive, travel through the site, and exit via South Market Street. This approach would limit the construction-related traffic to existing regional roadways and minimize Project-related construction traffic traveling through adjacent residential communities.</p> <p>The City will commit to supporting businesses that qualify for the Office of Economic Development's Strategic Fund set-aside for minority owned businesses. Provide notices to the Southbridge Civic Association for business development events hosted by the Office of Economic Development and economic development partners such as the Small Business Administration, Small Business Development Center, Delaware Division of Small Business, and Community Development Financial Institutions. The City and RDC will commit to advertising and holding outreach events for construction workforce opportunities in nearby disadvantaged neighborhoods.</p> <p>The Southbridge Neighborhood Action Plan is outside the scope of this Project which is focused on construction of transportation infrastructure improvements for the South Market Street Riverfront East area of the City. The Proposed Action would expand the road network branching from South Market Street towards the Christina River and replicating the downtown Wilmington grid system in the Project study area. While plans for development have not been finalized, future land redevelopment is anticipated to bring beneficial indirect effects by providing a mix</p>
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