

THE COALITION FOR BUZZARDS BAY

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May 21, 2010

Kristin Decas
New Bedford Harbor Development Commission
P.O. Box 50899
New Bedford, MA 02745

Re: South Terminal Marine Park Expansion Project

Dear Kristin-

The Coalition for Buzzards Bay (the "Coalition") is pleased to offer its support for the proposed South Terminal Marine Park Expansion Project ("South Terminal project"). The proposed project will help to revitalize the port as a state of the art marine terminal and advance the City of New Bedford toward becoming a support center for offshore wind energy production in New England.

The Coalition is a membership-supported nonprofit organization dedicated to the restoration, protection and sustainable use and enjoyment of Buzzards Bay and its watershed. The Coalition works to improve the health of the Bay ecosystem for all through education, conservation, research and advocacy. We represent more than 6,700 individuals, families, organizations, and businesses in Southeastern Massachusetts and our main office is located in New Bedford's historic waterfront district.

The South Terminal project involves the extension of the existing South Terminal bulkhead to the south by approximately 800 feet and creation of a solid-filled pier that will support heavy equipment and cargo. Ultimately, the project will result in a dredged basin in front of the bulkhead to support large international cargo ships and a channel with sufficient draft to allow entrance to large international vessels.

The long-term impacts of this project include the alteration of 6.6 acres of coastal habitat, including the loss of 0.71 acres of isolated wetlands and 2.99 acres of Land Under the Ocean that will be lost as Essential Fish Habitat and shellfish habitat due to the installation of the bulkhead and the filling behind the bulkhead to create the facility.

The Coalition understands that the mitigation strategy is currently focused on projects that specifically address the impacted resources. While appropriate, it is also important to consider projects that will provide the greatest overall environmental benefit for New Bedford Harbor. Substantial resources will be spent on this mitigation plan. As an urban harbor, more benefit may come from this investment if other alternatives are explored.

One mitigation alternative that was not included in the May 2010 Proposed Resource Compensation Mitigation Plan was the removal of Combined Sewer Overflows (CSOs). The Coalition believes that this project would score high on the alternative ranking matrix and should be explored further. The City of New Bedford has 26 active CSOs outfalls. These active CSOs are a major pollution source to New Bedford Harbor. The City has been working on eliminating all CSOs, but prioritizing the removal of these outfalls should also be considered as a mitigation project under the State Enhanced Remedy. The removal of any additional active CSOs will provide a significant reduction in bacteria and other contaminants entering the Harbor. One CSO that should be considered as mitigation for the South Terminal project is CSO 030, which is located in the Inner Harbor and near the proposed project property at Hassey Street.

The Coalition also supports the proposed pilot stormwater filtration project (or "rain garden" program) to provide areas for additional stormwater retention and/or treatment. One area that would benefit from this type of project is the land adjacent to the I-195 East onramp off of Washburn Street. Uplands freshwater wetlands mitigation projects could also provide additional stormwater benefits.

Overall, a key component of any mitigation project is long-term monitoring to ensure the effectiveness and continued success of the project. The Coalition supports the proposed monitoring and maintenance program and the evaluation of long-term monitoring and maintenance needs after the five-year assessment period.

We appreciate the opportunity to comment on the South Terminal project and look forward to continuing to work with the City as the project evolves.

Sincerely,



Korrin N. Petersen, Esq.
Vice-President, Advocacy

Cc: Mayor Scott Lang, City of New Bedford
Administrator Curt Spalding, EPA Region 1