RETURN TO SER AR INDEX

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OTHER: 518468

RE: Follow up on question re New Bedford/South Terminal
Davis, Gary (DCR) to: Ann Williams 06/28/2012 04:50 PM
Cc: Carl Dierker, "cmyers@apexcos.com", Jay Borkland, "Weinberg, Philip (DEP)", "'Eric Macaux'"

Good Afternoon Ann. In response to your June 19th inquiry, the Commonwealth offers the following response to your Readiness Plan inquiry:

Response to EPA E-Mail Request Requesting Explanation of Readiness Plan

From the outset, it is important to note that the Commonwealth of Massachusetts had no involvement with the development of this document and has no intent on utilizing any of the sites identified in the Readiness Plan for the New Bedford Marine Commerce Terminal (NBMCT) operations. Equally important, the Readiness Plan was produced prior to the beginning of the design process for the NBMCT Project. That being said, in preparing this Response, the Commonwealth learned the following background from its consultant, Apex Companies, LLC, the consultant for the Readiness Plans's sponsor, the New Bedford Harbor Development Commission (HDC).

The Port of New Bedford Readiness Plan (aka New Bedford Port Infrastructure Assets portfolio or Readiness Plan) was designed to serve as a marketing document that was commissioned solely by the HDC. The Readiness Plan was never intended to infer that the Port could replace or supplant the NBMCT project in any way. Rather, the Plan was an attempt by the HDC to capitalize on the unique assets of the Port of New Bedford to support the extended aspects of the offshore wind marketplace, particularly those activities that economists refer to as "secondary and induced benefits" opportunities that the NBMCT project would create for the Port.

As a member of the American Association of Port Authorities (AAPA) and the North Atlantic Ports Association (NAPA), the HDC had a good understanding of the assets, infrastructure, and characteristics of all of the other ports in the northeast. In 2008, after conducting research into future business opportunities that the Port might attract in the coming years, the HDC became convinced that the Port of New Bedford was ideally located and had unique attributes that made it the ideal port to support the newly developing offshore wind industry. The HDC noted that the port had a range of assets that the offshore wind industry would find very attractive to support proposed offshore wind developments in the Atlantic from Rhode Island to Maine. In the HDC's mind, this supposition was borne out in 2009 when agents for the offshore wind industry held discussions with the HDC to discuss the potential for using the Port of New Bedford as a staging area for the off-shore wind industry. That year, and through the following year, the HDC was in contact with multiple actors within the offshore wind industry, including Siemens (one of the largest offshore wind component suppliers), as well as offshore developers (such as Cape Wind), and the secondary wind component suppliers such as MassTank (at the time a potential foundation supplier), and marine cable suppliers.

The Readiness Plan was never intended to imply that the assets noted in the Readiness Plan could replace NBMCT functions. As noted in the Commonwealth's January 18, 2012 submission, the

SDMS DocID 518468

NBMCT is being developed as a multi-purpose marine terminal, a primary purpose of which will be to provide critical infrastructure to serve offshore renewable energy facilities and accommodate international shipping at the new facility. The proposed facility will also be capable of supporting other industries within New Bedford. In keeping with these stated purposes, the NBMCT site will need to stage, temporarily store, and pre-assemble wind turbine components such as blades, tower sections, nacelles and hubs. It is equally critical that the Commonwealth develop a port terminal facility that will have all of the attributes the wind component suppliers (such as Siemens and Vestas) have indicated are necessary and required for staging operations. Some of these attributes include:

(1) total site control of at least 28 acres that can support offloading and assembly areas during the construction phase of the offshore wind development project (Siemens has indicated that it cannot efficiently supply and assemble components for a multi-tower wind farm installation unless it has complete site control of the shipping and assembly port facility);

(2) 1,200-feet of quay-side area for multi-vessel loading and offloading;

(3) heavy load bearing capacity at the quayside for the operation of large cranes carrying heavy loads; and

(4) between 25 and 30 acres of open assembly and laydown area for the staging and assembly of tower sections, nacelles, and blades.

Bearing in mind the foregoing critical considerations, none of the locations presented in the Readiness Plan are practicable locations to stage and pre-assemble wind turbines. Nor do any of the locations presented in the Readiness Plan satisfy any of the attributes identified in the preceding paragraphs. Notwithstanding these observations, the Commonwealth questions whether many of the sites identified in the Readiness Plan are feasible given the significant site control issues associated with these sites.

Finally, because the Readiness Plan was developed prior to the start of the formal design process for the NBMCT Project, the plan lacks significant information, including construction and design analysis in relation to the specific needs of offshore wind developers. It is this type of information and requirements that has been developed as part of the design process for the NBMCT Project, including the fact that prospective offshore wind staging facilities, such as the proposed NBMCT, have very specific and specialized requirements that no existing port facilities within the Port of New Bedford, and indeed no other port facility in the northeast, currently have.

From: Ann Williams [mailto:Williams.Ann@epamail.epa.gov]
Sent: Tuesday, June 19, 2012 5:28 PM
To: Davis, Gary (ENV)
Cc: Carl Dierker; cmyers@apexcos.com; Jay Borkland
Subject: RE: Follow up on question re New Bedford/South Terminal

Dear Gary,

I'm writing to follow up on the email I sent to you on June 13, 2012, in which I transmitted a link to a New Bedford Harbor "Readiness Plan." It would be helpful if the Commonwealth could explain when this document was prepared and for what purpose, and how the plan described therein, including descriptions of site availability for additional lay down areas, fits into the overall South Terminal project that we are reviewing. In addition, it would be helpful if you could clarify statements made in this document about the ready availability (i.e., in 2-4 months) of State Pier notwithstanding the presence of existing water dependent users, compared to what is stated in the Commonwealth's January 2012 submission.

Sincerely,
Ann

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