



## South Terminal Public Comments

Pierre Bernier to: Group South-Terminal-Draft-Comments

07/20/2012 01:00 PM

Attn. Ms. Elaine Stanley, EPA New England

Dear EPA Administrators:

My name is Pierre Bernier, I have been working with cargo vessels at the Port of New Bedford in the capacity of importer and exporter, vessel agent, charterer and terminal operator since 1981, and I strongly support the development of the South Terminal in the New Bedford harbor. Since the container revolution of the 80's and the changes in the evolution of port operation, many harbors large and small have expanded their facilities with developing adequate infrastructures to handle the increase traffic of ocean going commercial cargoes created by the lower cost in ocean transportation. It is now time for the Port of New Bedford to modernize and the South Terminal would be a needed and timely development to allow for the handling of ocean wind mill farm projects as well as to capture the opportunities offered by the ever growing international and domestic trade of containerized cargoes.

In my estimation, this proposed multi purpose port facility will be able to entertain a weekly barge service of 450 containers (twenty equivalent units) with only utilizing 10 acres of yard storage which would leave a about another 12 acres of storage capacity for other type of cargo. It is important to state that such level of cargo activity at the Port of New Bedford will have an important economic impact in the area. In addition to the obvious port operation activities which involve the local private and governmental industry participants such as stevedores, truckers, tug operators, pilots, customs brokers, ship chandlers, Custom Border Protection, USDA, and US Coast Guard; this South Terminal will help to a even greater instances with the development of manufactures. History can repeat itself, the harbor was the center of activity during the whaling and the cotton mills eras and I am convince that having an adequate modern port facility will reduce transport cost for inbound or outbound materials and therefore help growing the industrial base within the Greater New Bedford area.

Furthermore, I have review the Draft Determination for the Proposed South Terminal Project and my only comment has to do with the various in harbor ballast water discharge statements made in this document. Since some of the comments could be misleading the public, I have consulted with my friend Captain Mike Taylor and will like to state that vessels do not have to intake ballast water inside a harbor to sail for high sea. This operation can be done on the way out in transit or at anchorage without putting a vessel in danger of sinking.. Also, there is no reference in your document concerning the federal regulations under CFR part 151, Subpart D addressing the matter of prevention of non-indigenous species entering via ballast water discharge. This law is monitored by US Coast Guard and if a foreign vessel fails to follow ballast water procedures and reporting requirements, it would simply not be allowed entry into the U.S.

Lastly, will like to recognize the valiant efforts made by EPA New England to expedite the South Terminal

Project and for their prompt practical conclusions.

Hopefully, this project will move forward and this area will soon benefit from having a competitive marine terminal of international standard.

Sincerely,

Pierre Bernier

Global Logistics Specialist

Maritime Terminal, Inc.

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