

Draft Responsiveness Summary Comments for Commonwealth Response
October 16, 2012

A. General Comments

1. *Comments nearly unanimously supported construction of the South Terminal and its potential use to support the offshore wind industry and future use for cargo shipping as an important economic boost for the New Bedford area.*

Response: The EPA thanks the all of the respondents for submitting their comments and questions on the Draft Determination.

2. *A significant number of comments focused on concerns about providing jobs to workers in New Bedford and its surrounding communities and about providing opportunities through jobs to retain local graduates and young adults so that this segment of the population can build a future in their hometowns. Questions were raised about union hiring and apprenticeships and about job training programs. Some comments expressed concern that jobs would be directed only to big companies and union workers to the exclusion of those most impacted by the project.*

Response: The EPA thanks the all of the respondents for submitting their comments and questions on the Draft Determination. While the EPA recognizes the benefits of job creation from the economic investment of such a project, hiring and contracting objectives are beyond the purview of the EPA. The project proponent and the project owner would be responsible for hiring and contracting decisions. The EPA has passed these concerns on to the Commonwealth.

3. *EPA received comments recognizing that one of the many benefits of the Project was the removal of PCB-contaminated sediment that would not otherwise be addressed as part of the Superfund cleanup and the remediation of upland areas that might not otherwise be addressed for a long period of time.*

Response: Commonwealth should respond with focus on the comment about upland remediation.

With regard to upland contamination, the planning and design of the proposed South Terminal Project has already resulted in environmental and public health benefits by identifying previously unknown contaminated areas at an upland property that is anticipated to be remediated and included in the New Bedford Marine Commerce Terminal. During due diligence activities completed at the proposed site, previously unknown concentrations of PCB and petroleum hydrocarbon impacts to soil were located. Identification of these impacted soils will allow the Commonwealth to address the potential hazards to the public that these soils represent. The Commonwealth, through this project, will excavate the most highly contaminated soils (“hot spots”) and dispose of that material off-site in accordance with the Massachusetts Contingency Plan (MCP) and the Toxic Substances Control Act (TSCA). The remainder of the site will be capped to ensure that any residual contaminated material is sequestered and remains isolated from human and environmental interaction. The upland environmental investigation and remediation

portion of the project is further discussed in the response to the following comment provided by Mr. Frank Haggerty.

B. Detailed Comments from Area Residents

1. Frank Haggerty raised a question about land transfers for the Project, particularly transfer of Brownfield properties that occurred after the start of the public comment period and whether EPA should wait until all the land involved in the project was transferred or purchased prior to holding a public comment period. His comments reflect a particular concern about inclusion of contaminated property in the Project; specifically, a portion of the Standard Times Field site and the underground fuel tanks, asbestos and coal tar residue at that site as well as the former Cannon Street Power Plant site and its proximity to South Terminal.

EPA Response:

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On August 2, 2012, Governor Patrick signed legislation approving the transfer of 3.4 acres of land adjacent to Blackmer Street in the South Terminal project area of New Bedford from the Commonwealth of Massachusetts to the City of New Bedford. In exchange, the City of New Bedford conveyed property on Rodney French Boulevard to the Massachusetts Department of Fish and Game. The approval to transfer the Blackmer Street property was for the purpose of developing the South Terminal project.

EPA does not believe there was any need to wait until the Commonwealth purchased or obtained easements on all the parcels within the Project area before seeking public comment on the Draft Determination. The properties proposed to be within the Project area, including the Blackmer Street property, were identified in the maps delineating the scope of the South Terminal Project at the commencement of the comment period. Thus, the public was able to comment on the Project and its environmental impacts with respect to any of the parcels, irrespective of who owned the parcels. The Commonwealth has been in a lengthy process of acquiring ownership or control over various parcels. We do not believe that waiting until property transfers or purchases were completed before issuing the Draft Determination would have provided any additional relevant information for purposes of the public's ability to comment on the project.

With regard to the underground fuel tanks and hydrocarbons, EPA assumes the commenter is referring to a 150,000 gallon fuel tank and hydrocarbons mentioned in the Phase I Environmental Site Assessment Report prepared by the TRC environmental consulting firm for the City of New Bedford. [See Report at page 8]. That report addresses Former Standard Times Fields Lot 9G, which is to the west of both the Blackmer Street "swapped" property and the site of the South Terminal Project. Because this property is not included in the Project, a response to the comment is beyond the scope of this document.

On a general note regarding remediation of contamination on the eleven acre upland area of the main portion of the South Terminal Project, including the property adjacent to Blackmer Street, the Commonwealth of Massachusetts has committed to conduct a remediation under the Massachusetts Contingency Plan. In addition, soils with elevated

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concentrations of PCBs will be addressed in a manner consistent with the federal Toxic Substances Control Act. As a result of these and other remediation activities, the upland area of the main terminal will achieve a level of “No Significant Risk” under the Massachusetts Contingency Plan. ▼

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2. *Rodney Avila and Richard LaFrance, both longtime commercial fishermen, had similar comments. They both voiced their support for the Project and commented on the importance of preserving the working waterfront and associated jobs in the fishing industry. They commented that they do not find any negative effects on the waterfront or fishing industry from locating a terminal that supports the wind industry. They commented that the terminal can be a productive engine for the working waterfront and for the next generation.*

Response:

3. *Karen [sic] Falange (Vilandry) orally commented that she supports the Project but not the use of a CAD cell. She commented that one part per million PCB is lethal and that PCBs are a dioxin. She also commented that there is a cumulative effect of the dredging projects in the Harbor, adding more PCBs to the Harbor and that CAD cells are “just a hole in the bottom of the sea, not lined. Just dig a hole, throw it in and that’s it.” Further, she commented that “when it was brought out to us tonight that tens of millions of dollars and billions of dollars have been invested in this South Terminal Project. Certainly 90 mill can be squeezed out for off-site disposal of PCBs.” She also commented that the Superfund dewatering facility should be used, if necessary, for offsite disposal.*

Response: Commonwealth should respond to the portion of the comment about the funding.

EPA agrees that PCBs are a toxic chemical that must be properly managed. EPA would not be conducting a superfund measure to remove PCB contaminated sediment in New Bedford Harbor if this were not so. However, EPA notes the following: The risk to humans posed by PCBs, is not solely due to the toxicity of the chemical, but is due to both the toxicity of the chemical and the exposure of humans to that chemical. Humans must be exposed by a mechanism such as: direct contact, ingestion, or inhalation for a risk to humans from those PCBs to exist. Due to their intrinsic physical and chemical properties, PCBs bind tightly to the organic content of sediment. The isolation of PCB impacted sediment into a CAD Cell removes the PCBs from any current or future exposure to humans, which eliminates the potential risk to humans.

The Commonwealth has communicated to EPA that in the planning and design of this facility, the Commonwealth has an obligation to the citizens of the Commonwealth of Massachusetts to select the most cost effective method of disposal of contaminated sediments, which is also protective of both the environment and public health. Previous studies, including the Commonwealth’s own Dredge Materials Management Planning process, a public process that took place between 1999 and 2003, have demonstrated that CAD Cell technology is a viable and safe method for containment and isolation of contaminated sediment, and that it can be performed at a significantly lower cost than dewatering and off-site disposal of the same sediment.

The Commonwealth has communicated to EPA that ninety million dollars represents a extremely large increase in cost for the proposed project; a cost that the Commonwealth would be unable to justify to the citizens of Massachusetts, if an alternate, and less

expensive, disposal method existed that the Commonwealth's own studies had indicated was a suitable and safe option.

The Commonwealth has communicated to EPA that the Commonwealth does not currently have a final construction cost for the New Bedford Marine Commerce Terminal (that information will not be available until the project is publicly bid); however, the Commonwealth has not and will not invest "billions of dollars" to construct the New Bedford Marine Commerce Terminal. The "billions of dollars" to which the respondent is referring, may be in reference to the amount of expected investment in the Northeast Region by private development in the Wind Energy Industry, however, the Commonwealth does not have the ability or jurisdiction to commit those potential future funds to the construction cost of the New Bedford Marine Commerce Terminal.

4. *Brendan Bowen, a recent college graduate, voiced his support for the Project and sees great potential for this Project to "bring in new companies...new innovative firms, places that need engineers...lawyers, accountants, maybe an economist or two." Such an outcome would provide local young adults with an opportunity to live and work in New Bedford and not have to leave for other jobs in other cities.*

Response: EPA thanks the respondent for his comments, and so notes the comments for the record.

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5. *Lauren Costello, a recent graduate from University of Massachusetts, Amherst, voiced her support for the Project because of the economic benefits it provides for the area and for its support for alternative energy. She also noted the potential to create "pertinent and progressive" jobs for recent college graduates.*

Response: EPA thanks the respondent for her comments, and so notes the comments for the record.

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6. *John G. Buddy Andrade voiced his support for the Project and sees it as a catalyst for producing long-term employment both from the wind industry and from the future shipping activities at the terminal. He wants to make sure that local high school graduates, college students and recent college graduates benefit from the Project; that jobs should not go only to big companies and union workers but that the various unions create training programs and apprenticeships for the local workforce. He commented that "there are still a lot of issues of discrimination and exclusion and EPA has played a big role in that and so has the state." He also commented that this is the first time [EPA and the State] had an open hearing and that stakeholders don't get invited to these kinds of public hearings. He commented that there should be greater inclusion in all processes so that there is a level playing field so that those most impacted by the Project are also realizing the benefits of the Project. Finally, he commented that agent orange (dioxin) is in PCBs and that "it wasn't part of the original raw decision to have CAD cells."*

Response: EPA thanks the respondent for his comments. While the EPA recognizes the benefits of job creation from the economic investment of such a project, hiring and contracting objectives are beyond the purview of the EPA. The project proponent and the project owner would be responsible for hiring and contracting decisions. The EPA has passed these concerns on to the Commonwealth.

EPA thanks the respondent for his positive view on the public comment period associated with this project. EPA has directed the Commonwealth to generate a Construction Management Plan which will, at a minimum, outline the process by which the Commonwealth will communicate with the community regarding the work associated with this project, including holding public meetings to discuss the project. EPA

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considers discussions of the open hearings associated with other projects or decisions to be beyond the purview of EPA for review of this project. EPA has been aware of low concentrations of dioxins (0.0017 mg/kg to 0.0081 mg/kg) within New Bedford Harbor sediment since before the issuance of the 1998 Record of Decision, and that the presence of the low concentrations of dioxin was considered when formulating its Record of Decision (ROD) as well as subsequent Explanation of Significant Differences (ESDs). EPA directs the respondent's attention to page 8 of the 1998 Record of Decision, which noted studies conducted before the issuance of that document (such as Pruell et al., 1990) that reported concentrations of polychlorinated dibenzo-p-dioxins (PCDDs) at four locations within New Bedford Harbor.

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B. Comments from the Boston and Northeast Maritime Trades Council, AFL-CIO; International Union of Operating Engineers, Local 4; Ironworkers, Local 37; Bricklayers Union; New England Carpenters Union; [Check for Longshoreman Union and correct names on sign in sheet]

1. The unions expressed unanimous support for the Project, noting the potential for jobs and revitalization of the New Bedford waterfront and the surrounding communities. They urged EPA to move forward with its decision-making, not only for the economic benefits to be realized from the project, but also from the cleanup of existing contamination that will result in a more healthy community. XXX union and XXX union also commented on their willingness to create apprenticeship programs to train talented local workers.

Response: EPA thanks the respondent for their comments, and so notes the comments for the record.

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C. Comments from Non-Profit, Religious, and Academic Institutions

1. University of Massachusetts, Dartmouth, Assistant Chancellor for Economic Development Paul Vigeant expressed his support for the Project, both orally and in writing, commenting that EPA conducted a careful analysis of the Project and agrees with EPA's conclusion that the Project is protective, meets ARARS and will have no adverse impacts. He notes the untapped supply of sustainable and renewable wind, wave and tidal energy just 30-40 miles offshore from the location of the proposed South Terminal and that modern industrial port facilities are an essential ingredient and absolute prerequisite for accessing those offshore energy resources. The project will create a wide range of jobs, including long-term jobs that will be attractive to local young adults, and reposition the region as a major deployment site within the ocean renewable energy marketplace.

Response: Commonwealth should respond to all except first sentence.

The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination.

2. Clean Water Action (Joel Wool) orally commented on the Project's benefit of removing contaminated sediment that would not otherwise be addressed. He also commented that, "Nevertheless, it is unclear if the viability of remediation of the

polluted harbor should be determined under the basis of supporting offshore wind.” He also asked to see a number of things:

A “detailed breakdown of alternatives to on-site burial that details specific cost estimates and a rationale for viability or unviability of these alternatives” similar to the alternative analysis EPA conducted in Appendix E to the Draft Determination;

If a cleaner method of disposal is possible, it seems reasonable to investigate the possibility of doing so and investigating funding sources for achieving this. If such an analysis has already taken place, please indicate where and how it has taken shape;

Response: Commonwealth should respond to this portion of the comment. (There may be some confusion here with the SF remedy. You should assume for these two paragraphs, he is talking about the south terminal project. EPA will respond to the rest of this comment which is not included here.

The detailed breakdown that the respondent is requesting was conducted by the Commonwealth during the Commonwealth’s own Dredge Materials Management Planning process, a public process that took place between 1999 and 2003. During that process, multiple different methodologies for dredging and disposing of contaminated sediment were considered. The results of that study determined that CAD Cell technology is a viable and safe method for containment and isolation of contaminated sediment, and is considerably less expensive than other alternatives, such as incineration or offsite transportation and disposal.

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EPA directs the responder to refer to these documents for the in depth analysis of alternatives to the use of CAD Cells, on which the Commonwealth based its decision, as well as the conclusions reached in the previous investigations of the available disposal alternatives.

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D. Comments from Federal and State Entities

1. Comments from National Marine Fisheries Service – National Oceanic and Atmospheric Administration (NMFS)

a. In order to reduce impacts of fill on sub-tidal habitat, the concrete blanket proposed for the pile supported apron adjacent to the wharf should be reduced to the maximum extent possible. [Following is included for reference and for response either as part of this answer or separately: NMFS further commented that the construction plans for this area be clarified, including how much area will be filled with rip rap, why it is necessary, and whether rip rap will only be necessary at the pile supported area or also along the 1,200 linear feet of bulkhead (and if so, why it is necessary and if necessary, should also be included in project impacts.)]

Response:

The EPA would like to direct the attention of NMFS to the attached “Essential Fish Habitat Assessment Addendum, New Bedford Harbor Marine Commerce Terminal” Prepared by Land Use Ecological Services, Inc. which directly addresses this comment.

b. *NMFS also commented that the Draft Determination is inconsistent regarding the minimum total area necessary for the marine terminal. Appendix E (section 4.3, page 15) says 28 acres; Section 4.4 of the Draft Determination says 20 to 28 acres are needed. The total minimum area required to meet the project purpose and need should be clarified.*

Response: Commonwealth to answer. [Note to Apex from Ann Williams: We recognize that the Commonwealth asserts that an even larger site would be justifiable, and we do not need additional statements to that effect. What underlies the comment is the question whether the aquatic impacts have been avoided to the extent practicable. To assist in our formulating a response, it would be helpful if Apex could explain, as it has orally in meetings, why the ~ 7 acre fill of aquatic resources is necessary irrespective of the size of the available backland. In other words, our understanding is that the size of the fill would not change in this case even if an additional 7-10 acres of upland were available. Please provide information that would enable us to explain this.]

EPA directs NMFS to the original documents which are referenced by Appendix E sections 4.3 and 4.4 of EPA’s Draft Determination for clarification. Appendix E Section 4.3 refers to a letter provided by Siemens (see Appendix 4 of the Commonwealth’s January 18, 2012 submission to EPA), the first expected user of the South Terminal Facility, which makes a general statement to the effect that a 28 acre facility is the minimum size which would be required to support a the Cape Wind project. This 28 acre figure cited in the letter is backed by information regarding Siemens’ logistics and planned construction schedule to justify their statement, including a diagram of how the area would be utilized. The letter points to the logistical considerations of staging material, offloading and loading, and assembling turbines that Siemens examined at this specific proposed facility which details how and why this area was calculated.

EPA also directs NMFS to other (non-areal) requirements that drive the filling of aquatic resources, also cited in the Siemens letter, such as the requirement that 1200 linear feet of bulkhead be available for berthing of one international vessel and two installation vessels at one time. Additionally, EPA directs NMFS to the Commonwealth’s estimate as to the loading criteria anticipated at the facility within Section 4.3.2 of the Commonwealth’s January 18, 2012 submission to EPA, which indicates that a pile-supported structure is not feasible due to the extreme point loads anticipated from large cranes lifting heavy pieces of equipment. It is the combination of these two requirements (1,200 feet of bulkhead and the high loading conditions that force the Commonwealth to utilize a filled structure) that necessitate a certain quantity of filling of aquatic resources that would remain constant, irrespective of the size of the available backland that could be added to the proposed project.

G. Comments from Commercial Entities

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1. *EDF Renewable Energy expressed its support and commented that, based on its European experience in developing and building offshore wind projects, the location and scale of nearby ports is an important component in choosing where to assemble components and deploy vessels. This project is likely to result in new investment and job creation in Massachusetts.*

Response:

2. *Maritime Terminal, Inc. (Pierre Bernier) expressed its support in writing and orally for the modernization South Terminal will bring to New Bedford. He noted the economic value of having a multi-use terminal and its potential to reduce transport costs for inbound and outbound material to help grow the industrial base in New Bedford.*

He also commented that vessels do not have to intake ballast inside the harbor before sailing for high seas; instead, intake the can be done on the way out in transit or at anchorage without putting the vessel in danger of sinking. He further commented that EPA did not cite CFR Part 51, Subpart D (prevention of non-indigenous species entering via ballast water discharge), a regulation enforced by the U.S. Coast Guard who would prevent a violator from entering the harbor.

EPA Response: Commonwealth on first paragraph; Phil/Cindy on second but Apex should chime in if you have ideas on a response

The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

3. *Deep Water Wind (Jeff Growbrowski) expressed its support for the Project, and voiced its confidence that offshore wind will begin in the northeastern part of the United States first and that New Bedford is ideally situated to the best wind resources offshore on the East Coast. He noted that huge ports have developed in Northern Europe where wind farms have been built and that his company is committed to building a large wind farm in the Northeast and committed to bringing jobs with them.*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

4. *Cape Wind (Jim Gordon) spoke of his support for the Project and, as happened in the past with construction of natural gas fired power plants that this company helped to build in the area which provided permanent, high-paying jobs for citizens in the area, this Project could "help catalyze and make this area the center of gravity for the offshore wind industry." He also commented that wind power produces even less environmental impact than natural gas power plants, thus reducing CO2 and SO2 in the air.*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

5. *Neptune Wind, (Chuck Degadi) voiced his support for the Project and noted that there is a cumulative effect to having this terminal built in that there are many offshore wind development companies that are interested in building offshore wind projects off the coast of Massachusetts and they will bring construction, operation, engineering and management jobs.*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

6. *Acorn Management Company (Steve Rodney) voiced his support for the Project especially given its potential to create jobs. He also expressed his faith in EPA and MADEP that they would now allow PCBs be contained if they believed it was going to be more harmful for the community; "We can approach those containment areas in the future and completely remove them when we have the technology and ability to do so." Mr. Rodney also noted that he is willing to help in any way possible and stated that he is sponsoring a staging area for a pump on one of his shoreline properties to support the dredging that is presently going on in the harbor.*

Response: Commonwealth on jobs; Elaine/Cindy on rest

The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination.

The EPA and the Commonwealth have determined that CAD Cells are a safe and economical way to permanently dispose of PCB contaminated sediment generated during the cleanup of New Bedford Harbor. Significant engineering studies as a part of the permitting process of the Dredge Material Management Plan for New Bedford / Fairhaven Harbor from 1999 to 2003, completed by the Commonwealth, have generated this determination.

CAD Cells are currently viewed as a permanent solution by both EPA and the Commonwealth. After final construction and capping, completed CAD Cells will be clearly demarcated on plans and other records of construction, so they may be monitored in the future or re-visited, if necessary, for any reason. Due to the expected permanence of the Cells, and their ability to prevent further spread or contact with the environment during storage, the CAD Cells will be equally suitable for permanent disposal of PCB impacted sediment as they will be for long term containment and storage of PCB impacted sediment. As such, should the economics of PCB destruction or disposal change in the future, any future entity (including EPA, the Commonwealth, or the City of New Bedford) will be capable of targeting and removing (if necessary) the material stored within CAD Cells.

7. *AFC Cable Systems (Ken Lamar) expressed its support for the Project seeing it as a job creator and as an opportunity to expand its business which produces armor cable.*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

8. *Joseph Abboud Manufacturing Corporation (Anthony Sapienza) expressed its support for the Project noting its past experience with the textile industry in New Bedford that has died and the "cataclysmic" kind of event this Project offers to support growth in the offshore wind industry and which can revitalize the area.*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

9. *Mass Tank Manufactures (Steven Lynch) expressed its support for the Project seeing it as a game changer, bringing new industry to the area as well as business expansions, noting that if it doesn't happen in New Bedford, it will happen somewhere else and all the jobs will follow.*

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Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

10. *New England Marine Renewable Energy Center (John Miller) expressed its support for the Project, noting the incredible scale of support needed for offshore wind, including assembly space, and the number of jobs created.*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

11. *TPI Composites (Jim Hannon) expressed its support for the Project and its potential for expansion of this wind blade manufacturing business.*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

12. *Fugro, (Sally McNeeland), an international geotechnical engineering from the Netherlands, expressed its support for the Project and the potential for expansion of its business in New Bedford.*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

13. *No Fossil Fuel (Mary O'Donald) expressed support for the Project and commented that PCBs should go into the CAD cell because it is urgent to get this Project done given the benefits of wind energy to the environment.*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

14. *SGURR Energy (James Toland), a Scottish company specializing in renewable energy, expressed its support for the Project, commenting that this company has been building and training its staff in the United States in anticipation of the wind industry. He urged an expeditious decision approving the Project "to help jump start the offshore wind industry in Massachusetts and the U.S.A. and be in a position to become a regional hub for future projects."*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

15. *K2 Management of North America (Garston Jensen) expressed its support for the Project and commented on the importance of investing in the infrastructure of the Harbor to support the wind industry otherwise the companies and jobs associated with the wind industry will move to harbors and ports that can accommodate the industry. He commented on the variety of jobs spawned by the industry and urge swift action on a final decision in favor of the Project.*

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Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

16. *Siemens Wind Power (Kasper Vincent), manufacturer of offshore wind turbines, expressed its support for the Project, commenting on the attributes of a Harbor that make it suitable to support assembly of the components of the turbines, including accessibility to the offshore turbine location, local employment, support from local businesses, and adequate acreage and based on his knowledge, the South Terminal Project meets these needs.*

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination

Global Marine Energy (Joel Whitman) an American subsidiary of a British company that is the largest installer of offshore cable in the world, expressed its support for the Project and commented that its company has a presence all over the world and with it jobs and that it would like to expand into the East Coast but so far there is not been a port to support offshore renewable energy. He urged all stakeholders to work together to bring this Project to New Bedford.

Response: The EPA thanks the respondent for commenting on the Draft Determination, and will consider this information in formulating a Final Determination