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Notes ID: AAA3DDFFE58DFB4085257A39004C624A

From: "Christopher.Boelke" <Christopher.Boelke@Noaa.gov>

To: Matt Schweisberg/R1/USEPA/US@EPA

Copy To: Ann Williams/R1/USEPA/US@EPA; Cynthia Catri/R1/USEPA/US@EPA; Dave Dickerson/R1/USEPA/US@EPA

Delivered Date: 06/14/2010 01:43 PM EDT

Subject: Re: NBH SER

Matt – The comments appear to accurately reflect the concerns of NMFS. Three issues that I would raise.

- 1) Page 3, #10 – I think that the dredging of the berth should be described as a direct effect of the project, rather than secondary effect, since the dredging is integral to the use of the area as a multipurpose facility.
- 2) I think that it is important to note that the State's economic analysis of potential alternatives does not fully consider the environmental costs of the project, nor the cost of mitigation and monitoring.
- 3) Based on the recent announcement by Cape Wind that they are working with the State to develop this terminal, I think that the issue of project segmentation is becoming an issue. There needs to be some linkage of this project to the Cape Wind EIS process, and a discussion of how the EIS will be supplemented, and how required consultations will be dealt with. Otherwise, I would be concerned that the Cape Wind project may have a significant part of the project (terminal) that was not assessed in their NEPA document.

Please let me know if I can provided further info to assist EPA.

Chris

On 6/11/2010 3:48 PM, Schweisberg.Matt@epamail.epa.gov wrote:

Hi,

At a meeting last week between EPA and the State, it was agreed that we would submit our comments in writing. Attached is a draft of our comments that I cobbled together from comments from each of you individually. Chris, you should ensure that NMFS' EFH comments are represented accurately and thoroughly. Everyone should revise the draft however appropriate.

I will be in the office Monday, then likely out the remainder of the week. Please email comments back to me but cc the other two. In my absence, I believe both Cyndi and Ann will complete the task.

Ann and Cyndi, let's close the loop on Monday re who should send these comments to the State.

Matt  - Christopher_Boelke.vcf