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Notes ID: CC8EB36CD6DA4B8686257A3900586E4B

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Delivered Date: 07/05/2012 03:24 PM EDT

Subject: Re: FW: South Terminal Project in New Bedford, MA - FEMA's review of potential floodplain fillings impacts (UNCLASSIFIED)

Paul:

I am working my way through the floodplain executive order and have the following question.

One of the Davisville alternatives is described as follows:

Finally, the Commonwealth evaluated a 45 acre undeveloped area between the Magnolia Street area and Quonset Airport. While there is ample backland area adjacent to the shoreline, there would be extensive environmental impacts associated with developing this parcel into a marine terminal capable of supporting offshore renewable energy development. Construction of a bulkhead to create sufficient berthing space would involve filling 6 acres of salt marsh and approximately 15.7 acres of intertidal and shallow sub-tidal area. From an acreage standpoint, these impacts are substantially greater than the filling of 0.18 acre of salt marsh and 6.67 acres of intertidal and shallow subtidal area associated with the Commonwealth's preferred alternative. In addition, to create an adequate boat basin, turning basin, and access channel, approximately 32.75 acres of shallow sub-tidal habitat would need to be dredged, compared to 20.15 acres of shallow sub-tidal habitat and 7.01 acres of deeper subtidal areas that would be dredged for the Commonwealth's preferred project. Although the South Terminal Project also involves the potential for up to 13.6 acres of maintenance dredging in the Federal Navigation Project, this dredging is expected to result in only minimal temporary impacts. If the berthing area were shifted to the south to avoid the salt marsh, the length of the channel and associated dredging impacts would increase. Given the greater areal extent of the impacts associated with development of this site, particularly in the valuable salt marsh, intertidal, and shallow subtidal areas, **One of the questions we need to ask ourselves on the floodplain executive order is: has the agency considered [practicable] alternatives to avoid adverse effects and incompatible development in the floodplain.**

We conclude elsewhere that this is a practicable alternative. The question is: does it avoid incompatible development in the floodplain. Would the filling occur between the two elevations that cause flooding problems and would it be greater than the 27.33 acres involved with the proposed remedy.

Thanks,

Bill