

## Response to EPA Question Regarding Explanation of Readiness Plan

*EPA Question (paraphrased): Please clarify the Commonwealths statement regarding the New Bedford State Pier relative to the statements made in the Readiness Plan document that was developed by the New Bedford Harbor Development Commission.*

**Response:** The reference in question is the statement in the City of New Bedford Harbor Development Commissions “Readiness Plan” that the timeframe for use of the State Pier is “2-4 months to implement”.

It is the Commonwealths understanding that the statement in the Readiness Plan refers to the amount of time it would take for the State Pier to be ready to handle *ancillary activities* associated with the overall Port of New Bedford becoming a center for offshore wind technology, and was *not* intended to imply that the State Pier could replace the South Terminal as a full Offshore Wind Staging Terminal. In fact, as previously stated in our earlier response to EPA’s Readiness Plan questions, the State Pier facility could not become the main facility for large-scale offshore wind assembly because it does not have all attributes that we now know a wind farm fabrication facility must have. The Commonwealth’s technical consultant on the South Terminal New Bedford Marine Commerce Park Project (Apex Companies, LLC) has provided us with the following salient information that relates to this question in explaining why the State Pier facility could not replace the South Terminal site as the main terminal for staging large offshore wind facilities or large scale marine shipping operations.

1. The State Pier currently contains only 3.9 acres of area that could be converted to Offshore Wind Project Assembly and Fabrication, a significant shortfall from the 25-30 acres that are needed for such a project (as we have come to understand from the offshore wind technology suppliers such as Siemens). With that limited acreage, it is questionable if the State Pier could host an offshore wind assemblage operation for a handful of turbines/towers, and certainly does not have the size to support a large-scale assembly operation of dozens to hundreds of turbines.
2. The supposition that was put forth in the New Bedford HDC’s Readiness Plan document that additional staging area at a nearby rail site could be used for lay-down area was made before there was a clear understanding of the size and weight of the components that are involved in offshore wind farm construction. While there is some limited acreage at the rail yard, there are a number of bridges and roadway turns that make it impractical to consider storing a large quantity of the larger wind components at the rail yard. The nacelle-hub assembly for the wind towers weighs so much that they cannot be transported by standard over-road or rail means. They are moved either using huge crawler cranes or by placing them on very large special-built transfer vehicles that are significantly larger and heavier than standard trucks and train cars. Similarly, the large quantities of wind blades needed for these large-scale offshore wind projects could not be transferred to the rail site with the current configuration of the roads in the area because of turning radius issues. In short, in order to accommodate the transfer of a large quantity of wind components needed for large scale projects, the City would need to reorganize much of the infrastructure in the area, replacing bridges and realigning streets and increasing the load-bearing capacity of the existing streets and the rail yard. This is impractical, as the City

is in the final stages of completing a 10-year project to realign the roadways in the area (which represents the heart of the City's waterfront district) to make it friendlier to the businesses and the public. In order to accommodate large-scale full wind tower installations at a combined rail yard and State Pier site, the City would have to remove much of the newly created infrastructure and redesign the waterfront district, disrupting many businesses and changing the waterfront district. The City (and the Commonwealth) have plans for commuter rail service at the rail yard, and the City has taken great pains to create a multi-functional waterfront in this part of the City. Turning the area over in total for large scale offshore wind development would mean curtailing most other activities in the area, as Siemens has indicated that total site control with minimal interference from other users is critical to the practicality of a terminal facility for the support of large scale offshore wind assembly.

3. Because there is almost no contiguous or nearly contiguous land area suitable for the purpose in the area, the only way to make the State Pier site useable for large-scale offshore wind project assembly would be to increase the size of the land area by filling in the waterway and incorporating the adjacent piers into the site. The Pier could not be enlarged to the east because of the presence of the Harbor Line (a statutory limit that marks the farthest filling could ever go). As much as 20-acres of land under water would need to be filled to the north and south of State Pier in order to create the 25-30 acres of land area needed for large-scale wind project component assembly, multiple existing businesses on adjacent piers would need to be removed and relocated, including an oil terminal and a large proportion of New Bedford's fishing fleet. It is the Commonwealth's position that this level of construction would be far more environmentally damaging than the plans advanced for the South Terminal site.
4. In order to use State Pier as the main assembly area for large offshore wind projects, a large number of Water-Dependant Businesses would need to be relocated. This includes the Ferry Terminal on State Pier, an oil terminal on Fisherman's Pier, the maritime police and HDC fleet of vessels that are used to manage the Harbor, and a large number of the fishing vessels that are currently located at the various piers nearby to the State Pier. Under Commonwealth provisions, a water-dependant-use business cannot be displaced without finding adequate similar water-dependant space for the business. In New Bedford Harbor, virtually all waterfront areas are developed with the exception of the area to the south of the current South Terminal. In other words, in order to make the State Pier suitable for full large-scale offshore wind assembly, not only would the City and Commonwealth need to conduct a very large construction project at State Pier, but a build-out at South Terminal would also be required in order to make a place to move the water-dependant businesses to. The environmental impacts of the combined required infrastructure improvements would far outweigh the impacts from simply constructing the New Bedford Marine Commerce Terminal at the South Terminal as proposed.
5. The Commonwealth has learned over the past year that the offshore wind developers require not just significant open acreage for their assembly areas, but that these operational areas must have a load bearing capacity that far exceeds that typical of US port facilities (as much as 2X to 4X times the typical weight capacity of most US marine facilities). Because of the weights of the components, and the size and weights of the cranes used to move the components, the load bearing capacity of the quayside and the work areas adjacent to the quayside must be able to handle weights that far exceed those typical of US Ports. As a result, if the Commonwealth were to try to convert the State Pier into the large scale offshore wind project terminal, the existing State Pier (and surrounding piers) would need to be demolished and re-built, or significantly strengthened, in order to meet the need. This would further add excessive cost to the cost to create the facility, and would make the project impracticable from a cost standpoint.

6. As stated in the Commonwealth's proposed project submission documents, the Commonwealth and the City of New Bedford intend for the New Bedford Marine Commerce Terminal to be a multi-use facility, serving the offshore wind industry but also acting as a major shipping terminal when offshore wind projects are not using the entire facility. Similar to offshore wind staging, the staging and shipping of large volumes of goods requires a large quay-side, significant vacant land area adjacent to the quay-side, and sufficient infrastructure (cranes, roads, utilities, etc). The State Pier site has many of the same limitations for large-scale shipping operations as it does for offshore wind staging. The land area available for large-scale staging and moving of containers, boxes, or bulk materials is insufficient as currently configured, and significant upgrades would be required. As for the wind terminal purpose of a major marine terminal, displacement of other water-dependant businesses would also be required for a major shipping terminal, one that could support future Short-Sea Shipping and other large scale shipping activities. In short, even if the offshore wind assembly purpose of the proposed marine terminal is discounted, a similar amount of construction would be required to make the facility useable as a production-level shipping terminal, resulting in appreciably more impact to the environment than if the facility were constructed as proposed at the South Terminal site.

In summary, the modifications that would be required to make State Pier a suitable substitute for the proposed New Bedford Marine Commerce Terminal are more environmentally impactful than the proposed location at South Terminal. Furthermore, the amount of infrastructure improvements that would be required would make the project financially impracticable. As such, the proposed South Terminal location for the New Bedford Marine Commerce Terminal represents the least environmentally damaging practicable alternative.

The above statements notwithstanding, the Commonwealth *does* agree with the City of New Bedford and the New Bedford Harbor Development Commission that the State Pier facility *does* represent a good location for *ancillary* activities associated with offshore wind projects and shipping projects. The State Pier facility is a viable location for transfer or storage of single or small batches of offshore wind components with some moderate infrastructure upgrades. Cable spools, small electronic components, even a few blades or nacelles or a foundation piece could be handled at the State Pier in the Commonwealth's opinion. There is significant value to the offshore wind and shipping industries to have assets such as the State Pier located in the same Port as the proposed Marine Commerce Terminal, however the Commonwealth does not believe that the State Pier facility can be made to substitute for the proposed South Terminal New Bedford Marine Commerce Terminal.