

## EPA Official Record

---

**Notes ID:** BF7E3F5302B477B085257AD80070FF7F

**From:** Mike Marsh/R1/USEPA/US

**To:** Carl Dierker/R1/USEPA/US@EPA; Ann Williams/R1/USEPA/US@EPA; Jackie Leclair/R1/USEPA/US@EPA; Carl Deloi/R1/USEPA/US@EPA; Ralph Abele/R1/USEPA/US@EPA; Phil Colarusso/R1/USEPA/US@EPA; Cynthia Catri/R1/USEPA/US@EPA

**Delivered Date:** 09/14/2012 09:26 PM EST

**Subject:** New Bedford South Terminal 9/13/12 site visit

All -

Just a quick update on Thursday's site visit to New Bedford South Terminal and the proposed mitigation sites at River's End Park and the airport. Paul S. said he would write up a detailed email reporting on the site visit, but I thought I'd let the team know some of the highlights:

1. We found an additional small area of salt marsh ( *Spartina patens* ) that will be impacted by the project (<0.1 acre). Apex is delineating and will provide estimate of area.
2. The High Tide Line will need to be re-delineated in a few places.
3. The River's End site shows promise as a compensatory mitigation area (likely to be ~1.0 acre). We asked Apex to provide a more detailed conceptual plan. We made some suggestions for maintaining flow through the expanded salt marsh area, to assure adequate tidal hydrology to encourage development of salt marsh (and reduce the chance of colonization by *Phragmites* or other invasive or inappropriate species).
4. We recommended that a berm shown on the old plans to support a trail be removed in favor of a boardwalk. (A walkway is required under Chapter 91, according to Apex. I would like some clarification of Chapter 91 requirements vis a vis wetland mitigation projects.)
5. Apex noted that soils being removed to create the salt marsh area are currently contaminated with metals and PAH. We noted that removal of these contaminated soils is an added benefit of the proposed mitigation that Apex should point out in their conceptual plan.
6. The proposed River's End site appears to be adequate to mitigate for the proposed impacts to salt marsh and non-BMX freshwater wetlands from the proposed project.
7. The proposed mitigation at the airport, meant to compensate for impacts at the BMX parcel, presents problems. It would be an expansion of an existing mitigation project at the airport that has proven to be controversial at the Corps. It would involve the destruction of existing upland forest

for proposed wetland creation, which we would typically not advocate. It is our strong preference to restore previously degraded wetlands, rather than attempt to create them, especially if such creation results in the destruction of existing wildlife habitat. In addition, the area apparently has been identified as habitat for box turtle, a state-listed species. We suggested that, in addition to more detail on their conceptual plan for the airport site, Apex provide alternative conceptual plans at other sites, since, from their preliminary description, the airport site may be unacceptable. Apex mentioned that there are other sites on the Fairhaven side of the river that have great potential for salt marsh restoration. We encouraged Apex to provide us with more detailed conceptual information on those sites.

Please let me know if you have any questions.

Thanks,

Mike

Michael Marsh  
Office of Ecosystem Protection  
U.S. Environmental Protection Agency - New England  
5 Post Office Square  
Suite 100 (OEP05-2)  
Boston, MA 02109-3912

Tel: 617.918.1556  
Fax: 617.918.0556  
email: marsh.mike@epa.gov