

March 27, 2007

By Electronic Mail

Secretary Ian A. Bowles
EOEA, Attn: MEPA Office
Nicholas Zavolas, EOEA No. 10316
100 Cambridge Street, Suite 900
Boston MA 02114

**RE: New Bedford Regional Airport Improvements Project – Notice of
Project Change: EOEA No. 10316**

Dear Secretary Bowles,

The Coalition for Buzzards Bay (“Coalition”) has reviewed the Notice of Project Change (“NPC”) for the New Bedford Regional Airport Improvements Project, (“Project”) and offers the following comments. The Coalition is a nonprofit membership organization dedicated to the restoration, protection and sustainable use and enjoyment of Buzzards Bay and its watershed. We represent more than 4,700 individuals, families, organizations, and businesses in Southeastern Massachusetts.

The Project

The New Bedford Regional Airport Improvements Project has been scaled down in this NPC from an airport expansion project to an airport safety improvement project. Essentially, The City of New Bedford has rejected the original Airport Improvement Alternative and chosen to advance necessary safety improvements instead. The Improvement Projects will include; 1. Runway Safety Areas (“RSA’s”) and Rehabilitation of Runway 5-23, 2. RSA’s and Rehabilitation of Runway 14-32, and 3. New Aircraft Rescue and Fire Fighting and General Aviation Facilities. The NPC states that the Project seeks to reduce the environmental impacts.

Direct Impacts to Wetlands from Filling

The NPC reduces the impact to federal and state wetland resources from filling to just over 6 acres. This is an improvement over the previously proposed filling of 31.61 acres of bordering vegetated wetlands. While the Coalition is pleased to see such a reduction in direct wetland fill and recognizes the public benefit to be gained from safety improvements, we remain concerned about whether the total wetland loss of approximately 6 acres can be fully mitigated.

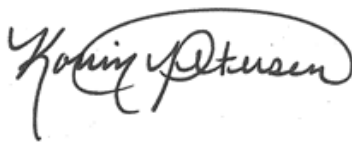
In order to insure that the value and function of these wetlands is replaced, the Coalition encourages the Secretary to require a 3:1 replication ratio for all filled wetland resources. In addition, a robust long-term monitoring and maintenance plan with clear performance standards should be required to ensure the proper care of the recreated wetlands long after construction is completed. Finally, we urge the Secretary to seek additional mitigation beyond wetland replication in the form of permanent protection of other, unaffected wetlands owned by the Airport either through grants of land or conservation restriction to a state Conservation agency or a qualified conservation organization.

Direct Impacts to Wetlands from Vegetation Management

The NPC states that approximately 11.29 acres of wetlands would need to be cleared in order to appropriately establish the runway safety improvements for runway 5-23. While this impact is associated with vegetation management as opposed to a direct wetland fill, impacts to the wetlands will nevertheless result. The proponent must be required to more fully address the impact to wetlands in conjunction with the vegetation management. In order to clear trees obstructing the runway safety area, the proponent must enter and perform work within the wetland resource itself. This NPC fails to speak to the methodology the proponent seeks to use or the impacts of that methodology may have on the resources and whether mitigation is appropriate. The Coalition encourages the Secretary to require the proponent to discuss in the Final Environmental Impact Report the use of biodegradable fuels for equipment used in the wetland, what types of equipment will be used in the wetland, as well as what mitigation measures might be necessary.

The Coalition appreciates the opportunity to comment on the proposed project and is available to the MEPA staff, the proponent, and other agencies to answer any questions spurred by these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Korrin Petersen", written in a cursive style.

Korrin N. Petersen, Esq.
Advocacy Director

Cc: Mayor Lang
Senator John Kerry
Senator Edward M. Kennedy
State Senator Mark C. Montigny
State Representative Steven Canessa
State Representative John Quinn
State Representative Robert Koczera
Dartmouth Conservation Commission
City of New Bedford Conservation Commission