



April 19, 2023

The Honorable Pete Buttigieg
Secretary
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Dear Secretary Buttigieg:

On behalf of the Casco Bay Estuary Partnership (CBEP), I am writing to express our support for the Portland Harbor Dredge and CAD Cell Project. The proposed effort is critical to ensuring the long-term economic viability of dozens of businesses along the working waterfront of Portland and South Portland.

CBEP is one of 28 National Estuary Programs sponsored by the U.S. Environmental Protection Agency, and the only located entirely in Maine. Our mission is to help conserve the ecological integrity of Casco Bay and its watershed through science, public stewardship, and effective management. We represent a collaborative effort of people and organizations interested in protecting and restoring the Bay, including the private sector, local governments, non-profit organizations, and state and federal agencies. CBEP implements our Comprehensive Conservation and Management Plan (CCMP), the *Casco Bay Plan 2016-2021*. This community-based plan explicitly identified the need for a solution for disposal of potentially contaminated dredged material in Portland Harbor, under Action 3.2.C “Help Portland create a solution for dredged material disposal.”

Concern about toxic materials in Portland Harbor was one of the original concerns that led to the creation of the Casco Bay Partnership in 1991, when Casco Bay was designated as an estuary of national significance. The Estuary Partnership has worked ever since to understand toxic contaminants in Casco Bay and to find environmentally sound ways to dispose of contaminated sediments dredged from the harbor.

The Estuary Partnership sees a vibrant waterfront economy as an essential asset for the Cities of Portland and South Portland, and a defining part of our regional character. The harbor is the key symbolic and economic link between people and the Bay. Our working waterfront supports the lobster fishery, recreational boating, and our growing aquaculture sector, but it also defines the character of downtown Portland and helps attract tourists and visitors to our restaurants, hotels, and shops. The Greater Portland Metropolitan Area contains more than a third of Maine’s total population, making it the largest metropolitan area in northern New England, and a mecca of culture and diversity. Much of our area’s attraction is based on our marine businesses, and those businesses depend on access to waterfront facilities. Unfortunately, that access has been threatened over decades by shoaling in the slips adjacent to private and public piers in the harbor.

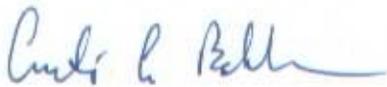
The proposed project would revitalize the harbor and support waterfront businesses by performing maintenance dredging around many private and public piers. The materials generated by dredging would be deposited in a Confined Aquatic Disposal (CAD) cell. The U.S. Army Corps of Engineers (ACOE) conducts maintenance dredging of the harbor's navigational channel on a regular basis, but the last dredging around most of the piers took place on the order of 75 years ago.

In 2007, the Estuary Partnership commissioned a study that concluded that the only cost-effective approach to disposal of potentially toxic dredged materials from the Harbor's private and public facilities would be through development of a CAD cell. The Board of Harbor Commissioners, the Harbor Master, Maine Port Authority, Maine Department of Marine Resources, U.S. EPA, and ACOE all served on the Portland Harbor Dredge Committee, convened by CBEP in 2007 to coordinate federal dredging and develop options for dredging around private and public piers. Now, more than a fifteen years later, we have detailed designs both for dredging and safe disposal, and the necessary permits are in hand to proceed.

Since 1991, the Estuary Partnership has commissioned multiple studies characterizing persistent toxic chemicals in Casco Bay sediments. A recent review of more than 20 years of data demonstrated that we are putting fewer and fewer persistent toxics into the Bay. The Bay's shallow surface sediments, which accumulated on the bottom of the Bay recently, are cleaner than the older, deeper sediments. Our independent review of data provided by Campbell Scientific revealed that the (mostly older) sediments to be dredged from the harbor during this project contain elevated levels of PCBs, DDT residues, and other contaminants. Dredging contaminants from the harbor and burying them within the CAD cell will reduce the likelihood of exposure of people or marine organism to toxic contaminants.

This project will not only restore the piers to working order, but also improve the ecological health of the harbor and the Bay. For these reasons, Casco Bay Estuary Partnership is strongly supportive of the proposed project.

Sincerely,



Curtis C. Bohlen, PhD
Director, Casco Bay Estuary Partnership