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To: [DeMeo, Sharon M.](#)
Subject: Comment submission for NPDES Permit No. MA0006018 regarding COOLING WATER INTAKE STRUCTURES for SouthCoast Wind
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I am against you approving this permit because you would be allowing SouthCoast Wind to do something that has a lot of unknowns. In Section 4 of this study published by BOEM in April 2022, "Supporting National Environmental Policy Act Documentation for Offshore Wind Energy Development Related to High Voltage Direct Current Cooling Systems", it says, "The number of larval fish and invertebrates lost in the process is difficult to measure. Losses of larval food sources for other species is notable, in addition to the larval species that do not survive to maturity. It is unclear how many marine species do not mature to reproduce and provide fish and shellfish for human and animal consumption." According to the SouthCoast Wind Project Overview says they are planning 2 of these offshore cooling stations. Combined, they will be recirculating 20 million gallons of water a day. All that water will be chemically treated and discharged at temperatures of 79.5-83.3 degrees (NPDES Permit No. MA0006018, Part 1, A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS). You are also permitting them to discharge water with a pH as low as 6.5 (Ibid, footnote 6.) WHOI claims that the average pH of the ocean has declined since the dawn of the industrial age from 8.2 to 8.1, and they want to add alkaline to the water to increase it. Allowing SouthCoast Wind to discharge 20 million gallons of water at a pH of 6.5 would conflict with this. It is unknown what harm this can bring to the ocean's ecosystem. By approving this permit you are allowing SouthCoast Wind to perform experiments in our ocean that will bring unknown consequences. Just going by BTA is unacceptable when it comes to jeopardizing the regional ocean environment. One of the slides displayed at the virtual meeting on Monday Nov 10, 2024, the diagram should that impingement, entrainment, and entrapment will have fatal effects on fish, turtle, and mammals. There are four sea turtle species that are present in the SouthCoast Wind lease area. Two of the species are listed as endangered, the Kemp's Ridley and Leatherback. The Atlantic Sturgeon, another endangered species, is also present in the area. There are not any Take Authorizations for SouthCoast Wind that list these species, so permitting SouthCoast Wind to proceed with this operation would be in violation of the Endangered Species Act. More study is needed before permitting this application.

Kenneth Adams