

From: Katrina Hamilton Gewirz  
To: Demeo, Sharon M.  
Cc: Kaler, Katie Hamilton Gewirz  
Subject: SouthCoast Wind Offshore Converter Station: National Pollutant Discharge Elimination System  
Date: Wednesday, November 6, 2024 10:17:20 AM

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Ms. Demeo,  
Please confirm receipt of this email with a response.

I am writing as a basic lay person who is observing the industrialization of the Atlantic Ocean by Wind Farms & specifically the 9 wind farms off the coast of Rhode Island and Massachusetts.

I have spent the past year+ in a deep dive of information, working countless hours a week with engineers, scientist, commercial and recreational fisherman and more. Even with my basic level of knowledge it is painfully obvious the current PERMITTING process is deeply flawed.

These flaws have the potential to lead to irreversible and devastating environmental and social destruction not limited to the extinction of endangered species, the reduction of available local food sources, and social injustices.

After being a participant in the Monday, November 4th Public Hearing & information session, it became apparent that the EPA is being asked to and agreeing to grant permits in isolation of THE KNOWN requests for future permits in the immediate vicinity based on the publicly available plans for SOUTHCOAST WIND and the necessary components to complete this project.

The EPA is reviewing, as they openly admitted, only the permits before them. This review in isolation is not new information. The 9 offshore wind farms in various stages of permitting off of MA & RI is wholly lacking in a cumulative impact study. Each wind farm (Revolution, Southcoast 1 & 2, Sunrise, Starboard, Southfork, Becon, Vineyard Wind 1 & 2) is being permitted individually. Even within each project, as is the case for 1 vs all Pollutant Discharge Elimination System for SouthCoast, individual projects themselves are being broken in to smaller permitting request, thus avoiding & eliminating the critical eye necessary to understand the full impact of the industrialization on marine life and the extensive ripple effect beyond.

I am requesting:

- Entire projects be assessed with all components, not with specific components within a complete project to be permitted in isolation
- The EPA move to require this (and all) permitting requests to include all necessary Pollutant Discharge Elimination Systems within a project to be presented in tandem vs isolation.
- Should the aforementioned not be possible, the EPA should, with any permit approvals, require A POST CONSTRUCTION, MULTI YEAR STUDY of the environmental EFFECTS OF THE APPROVED PERMITTED STRUCTURE PRIOR TO ANY REQUEST or approval FOR ADDITIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEMS or ANY additional additional industrialization until all NEW environmental BASELINE of the area is established. Only this way can a thorough and scientific methodology be available to determine the effects of each change in isolation. READ: If you are permitting in isolation, follow up studies of the effects should be done in isolation as well = PRIOR to additional permitting. Only this way is there a near analysis of the environmental effects of what ONE vs all structures have done to the area. There needs to be a CONSTANT in the post build analysis of SOUTHCOAST discharge systems. Approving any additional discharge systems prior to a study that revisits the "new normal" of the surrounding environment is to ignore respected established scientific practices.

**- Avoiding the suggested prior step of a NEW BASELINE analysis has the potential to result in a rolling permitting process in the absence of recognizing in real time the environmental harm, change, destruction being caused along the way.**

- The EPA should require a baseline as this would allow for a true, NEW, scientifically observed measurement that takes in to consideration changes in the area due to the first discharge system, allowing for an accurate understanding of the environment in which additional structures would be permitted.

- Cumulative impact studies are a BEST PRACTICE way to inform decision-making at every level: federal, state, and local. Cumulative impact assessments take in to account quantitative & qualitative information when siting potential outcomes. This moves the scientific community beyond a standard, traditional risk assessment process. A process which only considers specific exposures and morbidities. (1,2,3, 4)

Cumulative impact studies can, at a minimum:

- address the multiple stressors
- consider the full effect of sensitive populations and socioeconomic factors
- help prevent and/or minimize harm that can result from MULTIPLE vs individual facility emissions and discharges such as the SOUTHCOAST Pollutant Discharge systems
- help identify key leverage points which may lead to better ecological outcomes

In the public meeting, there was a claim that the most advanced/currently available products would be used. A product can include not just a physical component but an analysis as well. The current system of the EPA permitting individual components of a known WHOLE project with multiple components of the exact same structures, Leads to a massive margin of scientific error as it wholly lacks the ability to calculate the potentially devastating cumulative impact of the entire entity, or in this case, entities.

In this case, the EPA should require any permitting to include all future permitting requests expected. In this case- SOUTHCOAST WIND should be required to provide an overview of what future permits it will be requesting and at what stages and after what analysis is completed. If there is no plan within a request for permitting for a post build analysis of one structure prior to the permitting of another, the this post build analysis should be required in any permitting granted by the EPA.

As the EPA permits in isolation various components of the SOUTHCOAST Wind project without the necessary overlay, AND IN ISOLATION OF THE VAST AND FAR REACHING INDUSTRIALIZATION over the planned 9 separate wind farms, it is arguable that a plethora of crimes are being committed against, but not limited to: The Outer Continental Shelf Lands Act, Clean Water Act, and Endangered Species Act.

The SOUTHCOAST National Pollutant Discharge Elimination System, if approved as is, falls far short of the statutory and regulatory provisions enacted to protect state and national interests and violates many important environmental protection requirements. (5)

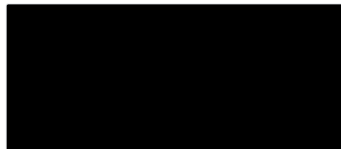
I write to request the EPA NOT APPROVE ANY ADDITIONAL PERMIT REQUEST FOR ANY OFFSHORE WIND INDUSTRIALIZATION STRUCTURES UNTIL THE EXISTING PERMITTED STRUCTURES (Revolution, Vineyard Wind) HAVE BEEN IN PLACE FOR A LONG ENOUGH\*(6) TIME to allow for a new baseline study of the area. Any approval should require a MULTI YEAR delay for construction until new studies are conducted and the new reality of the environment is understood.

Avoiding the aforementioned delay is to rush a project and knowingly risk irreversible and potentially devastating environmental damages to the marine life and more. Currently, it is easily arguable that the off shore industrialization off the coast of RI & MASS is a Pilot study. Too much is at stake to continue in this siloed permitting process.

Should you wish to contact me, my information follows.

Respectfully submitted:  
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1: [Scientific dimensions of cumulative effects assessment: toward improvements in guidance for practice](#)



Scientific dimensions of cumulative effects assessment: toward improve...

Cumulative effects assessment (CEA) became an increasingly important component of environmental impact assessmen...

2: [https://d1wqxts1xzle7.cloudfront.net/114539628/Artigo06\\_2017\\_20-20\\_Foley\\_20at\\_20al-libre.pdf?1715696696=&response-content-disposition=inline%3B+filename%3DThe\\_challenges\\_and\\_opportunities\\_in\\_cumulative\\_effects\\_assessment.pdf&Expires=1730906245&Signature=FF3CgI4Oytrnm1YkYmoCSulPT9p2L~wvyBDz8XvjB7A9Ctly4vZ740dKbYY7Deu-y3h1Qta-t3lqMX3VBnqEzgrkWHATXBNUYJPpy6rsvXUJB1EOpNRxVHOaL5eSFA0eIkU~qDjb23a0Kq31JJItrhpAxKRl4pGpkB90oLy1K5VaG4tQ-LHNqkxTFhGaBQPbhu-PC9LpeZ0yasB8llqJcVmwkNOG7PwxbKzfc1gtQHGTwiARazDdCj4GGKPt-XZCp2jxkCNUcW9yTdsIIITnahQRMW-oUJ2MnAJRT1EPmBR5bj2lucxN1oKwoOfvUCla5ztCYBqVtNuYA\\_\\_&Key-Pair-Id=APKAJLOHF5GGSLRBV4ZA](https://d1wqxts1xzle7.cloudfront.net/114539628/Artigo06_2017_20-20_Foley_20at_20al-libre.pdf?1715696696=&response-content-disposition=inline%3B+filename%3DThe_challenges_and_opportunities_in_cumulative_effects_assessment.pdf&Expires=1730906245&Signature=FF3CgI4Oytrnm1YkYmoCSulPT9p2L~wvyBDz8XvjB7A9Ctly4vZ740dKbYY7Deu-y3h1Qta-t3lqMX3VBnqEzgrkWHATXBNUYJPpy6rsvXUJB1EOpNRxVHOaL5eSFA0eIkU~qDjb23a0Kq31JJItrhpAxKRl4pGpkB90oLy1K5VaG4tQ-LHNqkxTFhGaBQPbhu-PC9LpeZ0yasB8llqJcVmwkNOG7PwxbKzfc1gtQHGTwiARazDdCj4GGKPt-XZCp2jxkCNUcW9yTdsIIITnahQRMW-oUJ2MnAJRT1EPmBR5bj2lucxN1oKwoOfvUCla5ztCYBqVtNuYA__&Key-Pair-Id=APKAJLOHF5GGSLRBV4ZA)

3: <https://citeseerx.ist.psu.edu/document?repid=rep1&type=pdf&doi=a86562f3c9ef403f9be9f1d48dccb1ed19c5e3f8#page=15>  
Challenges and opportunities for research supporting cumulative impact assessments at the United States environmental protection agency's office of research and development



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A growing body of scientific evidence shows that in overburdened communities the cumulative impacts from exposur...

4: [https://www.thelancet.com/journals/lanam/article/PIIS2667-193X\(23\)00240-5/fulltext#:~:text=Cumulative%20impact%20assessments%20incorporate%20both,evaluated%20using%20long%2Destablished%20methodologies](https://www.thelancet.com/journals/lanam/article/PIIS2667-193X(23)00240-5/fulltext#:~:text=Cumulative%20impact%20assessments%20incorporate%20both,evaluated%20using%20long%2Destablished%20methodologies).

5: [https://img1.wsimg.com/blobby/go/a72a4fb3-98f1-4cf3-94b6-d3034a1b7de8/60%20Day%20Letter%20of%20Intent\\_%20BOEM%2C%20Army%20Corps%2C%20NMF.pdf](https://img1.wsimg.com/blobby/go/a72a4fb3-98f1-4cf3-94b6-d3034a1b7de8/60%20Day%20Letter%20of%20Intent_%20BOEM%2C%20Army%20Corps%2C%20NMF.pdf)

6: [Taking the Long View: U.S. Scientists Affirm Value of Long Term Research](#)



**Taking the Long View: U.S. Scientists Affirm Value of Long Term Research**

A new Yale-led study provides a detailed glimpse into how the U.S. ecological community views the direction of l...