

SUBJECT LINE:

Reject SouthCoast Wind Energy, LLC Permit for Dredging

Ronald Gagnon, P.E.

Rhode Island Department of Environmental Management

Office of Customer & Technical Assistance

235 Promenade Street, Providence, RI 02908

Email: [ron.gagnon@dem.ri.gov](mailto:ron.gagnon@dem.ri.gov)

Tel: 401-537-4013

Dear Mr. Gagnon,

I am writing to urge you to reject the "Dredge Application Request of SouthCoast Wind, LLC". I oppose their intent to dredge, install and operate two underwater power export cables and associated communications cabling, each approximately 20.4 miles long, in the Sakonnet River and Mount Hope Bay in Portsmouth. The impacts to our marine habitat and fishing and aquaculture industries will be irreparable.

- **There is currently NO POWER PURCHASE AGREEMENT in place.** Approving the cable installation is premature. Permitting should not be done on a timetable dictated by the developers when we don't know if this project will even come to fruition. Irreparable damage will have been done and cannot be undone.
- **Chemical testing has not been completed to identify the toxins in the sediment.** The effects of the dredging may cause resuspension of contaminants from over a century of dumping of industrial toxic waste, causing disruption to filter feeders, spawning fish as well as the fishing and aquaculture industries that depend on them. The whole food chain will be impacted – from vegetation to plankton, shellfish, fish, birds, animals, and even humans.
- **Unknown effects of the EMF emanating from 345,000 high voltage subsea electrical cables on marine life.** If cables are not buried or blanketed properly or if they do not remain buried (as happened with Block Island), electromagnetic fields could be disruptive to migratory patterns, feeding and spawning behaviors. Studies show that lobsters and other marine life are highly affected and deformed by electromagnetic fields. Visit: <http://tinyurl.com/nr9zbbh8> & <http://tinyurl.com/3rtsvarj>
- Subsea cables must be regularly monitored and maintained, so the **disruption to the seabed is NOT a one and done proposition.** Subsea cables make up just 10% of the initial cost of building an offshore wind farm, but account for 75-80% of insurance claims by the offshore wind industry. The cost implications of even a **single cable failure can be enormous: repairs take an average of two months and often exceed \$12.5 million in costs** and lost power generation. Visit: <http://tinyurl.com/2ad87924>

**RI DEM must be held accountable to its own statements and protocols:**

- RI DEM has explicitly stated, “Our mission, put simply, is to protect, restore, and promote our environment to ensure Rhode Island remains a wonderful place to live, visit, and raise a family.
- Moreover, at a public presentation in Portsmouth, RI on November 17, 2022, **experts from RI DEM and U. MASS Dartmouth said they were unsure of the potential negative effects of electromagnetic force (EMF) on the various species of sea life in the Sakonnet\***.
- Failing to provide crucial information from independent fisheries experts falls short of “adequate resource planning.” The RI DEM and UMASS experts suggested guidelines for before/after studies, so if this permit is granted and dredging performed in the meantime, it will be too late, literally impossible for any negative effects on existing populations to be “undone”. The testing/studies were incomplete in 2022, and **still have not been completed.**

I believe **this permit violates the Public Trust Doctrine in Rhode Island’s Constitution.** This doctrine requires by “all means necessary and proper by law to protect the natural environment” for Rhode Island waters. The significant uncertainty about the risk to the Sakonnet River and Mt. Hope Bay ecosystems and fishery from the proposed cable warrants, indeed demands prohibiting approval. (Article 1 Section 17 Rhode Island Constitution).

Respectfully submitted,  
YOUR NAME  
YOUR ADDRESS  
YOUR EMAIL

\*Presentation link:

[https://drive.google.com/file/d/1gUjoUW4FO7pfakspl-arsW2rqbzSQGkG/view?usp=share\\_link](https://drive.google.com/file/d/1gUjoUW4FO7pfakspl-arsW2rqbzSQGkG/view?usp=share_link)