



Massachusetts Lobstermen's Association

8 Otis Place ~ Scituate, MA 02066
781.545.6984

June 17, 2024

via the Federal Portal: www.regulations.gov

Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

RE: Docket ID No. EPA-HQ-OW-2023-0591

To whom it may concern,

The Massachusetts Lobstermen's Association (MLA) sends this letter of comment to you regarding the request from Woods Whole Oceanographic Institute (WHOI) for two research permits for the transportation and disposition of sodium hydroxide solution, an alkaline liquid, into ocean waters in Southern New England (SNE) and the Gulf of Maine (GOM). Without any other projects being done like this in the United State to date, the MLA is greatly concerned about the long-term implications of this project. More lab work needs to be done on a larger scale before truckloads of liquid alkaline can be dumped in the ocean.

The MLA is greatly concerned as the SNE and GOM commercial lobstermen are continually under siege from a pleather of issues that have a negative impact on their livelihood from offshore wind, increased predations and settlement decline. These are just a few issues that are at the top of the matter and this project will add even more unintended and negative attention while WHOI tries to reduce carbon dioxide from the atmosphere and store it in the ocean until eternity is counter intuitive.

Established in 1963, the MLA is a member-driven organization that accepts and supports the interdependence of species conservation and the members' collective economic interests. The membership is comprised of fishermen from Maryland to Canada and encompasses a wide variety of gear types from fixed gear and mobile gear alike. The MLA continues to work conscientiously through the management process with the Massachusetts Division of Marine Fisheries, Atlantic States Marine Fisheries, Atlantic Large Whale Take Reduction Team, and the New England Fisheries Management Council to ensure the continued sustainability and profitability of the resources in which our commercial fishermen are engaged in.

The WHOI project is a mistimed and a novel idea as the United States embarks on the industrialization of the Exclusive Economic Zone with the development of offshore wind which is supposed to reduce carbon dioxide from the atmosphere and eventually our oceans. Why would anyone want to take carbon dioxide from the atmosphere and store it in the oceans where our seafood comes from is unreasonable and unethical. The physical act of doing this project will have a carbon dioxide component, what is this and what is the carbon dioxide credit value of this project?

The MLA and WHOI have a longstanding relationship, working together on countless projects as it relates to the MLAs Mission Statement: *The Massachusetts Lobstermen's Association is a member-driven organization that accepts and supports the interdependence of species conservation and the members' collective economic interests.*

Lastly, consumers want to know that what they are eating is clean and unaltered when they are purchasing wild harvested seafood. Unfortunately, that would be misleading once WHOI adds the alkaline liquid and dye, albeit minute in the scope of the ocean, this stabilizer will impact our commercial fishermen in ways we will not even know of until its already done. The MLA continues to work hard to keep our fleet fishing and the seafood they harvest on the plates of consumers and anything that will differentiate our lobsters in a negative light to consumers is unacceptable.

Thank you for your thoughtful deliberation and consideration of our comments.

Kind regards,

Beth Casoni

Executive Director