February 18, 2025

To: U.S. Environmental Protection Agency
1200 Pennsylvania Avenue,
Washington, D.C. 20004

Reference: Docket No. EPA-HQ-OLEM-2024-0360/ Interim Framework for Advancing Consideration of Cumulative Impacts

To Whom It May Concern:

I am writing to you because I believe that the EPA including Cumulative Impacts into their Regulatory processes is long overdue. Having Cumulative Impacts in the Regulatory Process, policies, procedures and or guidelines should have gone into effect- the minute that Hurricane Katrina hit New Orleans in 2005. Having Cumulative Impacts in the U.S. EPA's Regulatory process is extremely important to low-income communities and communities of color. Staten Island's North Shore was designated as a U.S. EPA Environmental Justice Show Case Community in 2009.

To have had Cumulative Impacts in place with all the environmental agencies in 2009 would have been a gamechanger for Staten Island's North Shore Environmental Justice communities. At the time we had 21 plus sites with contamination issues from old industrial and manufacturing uses. Other than one area in Queens, New York, the children on the North Shore of Staten Island had the highest lead levels in their blood while children's lead levels in the other 4 boroughs had decreased over the years. The U.S. EPA had never seen an area with so many contaminated sites and containing a wide variety of contaminants. The goal of the North Shore Waterfront Conservancy of Staten Island, Inc., was to get the government to acknowledge these sites their contaminants and their proximity to each other and the residential communities. We also wanted to get as many of these waterfront sites remediated by the government before Staten Island's North Shore was hit with a hurricane that could migrate the contamination from these sites and the polluted rivers to the properties and homes of the Environmental Justice Communities directly across the street from these sites and waterfront.

It was shocking at the time to learn that neither NYS Department of Environmental Conservation, the U.S. Environmental Protection Agency, nor The U.S. Army Corps of Engineers had Cumulative Impacts in their regulations, policies, procedures or guidelines. Having conversations with the environmental agencies about Cumulative Impacts was mystifying, I couldn't help thinking and even saying how can you ignore the obvious?

Although some of the contaminated sites have been remediated there are still sites that have not been remediated and are still being used for industrial uses that cause air quality issues for the North Shore Environmental Justice communities. In addition, the North Shore of Staten Island is on a shipping channel. And foreign ships emissions are not regulated and there isn't any air quality equipment that can determine the quantity of emissions that are being released by vessel traffic. Residents are not only breathing in air from the Staten Island industrial sites, but they are also breathing in air polluted by the 24/7shipping operation that is taking place in the Kill Van Kull, Lower Newark Bay and the Arthur Kill. Staten Island's North and West shores also receive air pollution from New Jersey's Refineries and air pollution from as far as Ohio.

Please keep in mind that the Kill Van Kull, Lower Newark Bay and the Arthur Kill provide a food source for residents of Staten Island, they eat the fish and the shellfish from these waters. They always have and they always will. It is equally important to the well-being of the residents of Staten Island that the remaining tidal wetlands and the few freshwater wetlands that are left are protected from development. As these wetlands are part of their resilience efforts to help combat the effects of sea level rising, storm surges and flooding from the rivers and the bay, as well as inland flooding from torrential downpours and from tons of hard surfaces and Climate Change.

Lastly, North Shore residents only recently came to realize that as container ships increase in size there will always be another U.S. Army Corps of Engineers blasting and dredging project lasting up to 7 years in the Kill Van Kull to disrupt their lives and cause property damages where claims are frequently ignored or denied. Other than the remediations that were done on the contaminated sites there has not been any efforts to offset the environmental harm and stressors that become serious illnesses that are experienced daily in the lives of the people on the North Shore from East to West. These communities are way beyond attending meetings after meetings what they want to see is action on the part of the U.S. EPA and other government agencies that improves their quality of life.

Thank you for your time and consideration.

Sincerely,

Beryl A. Thurman
Formerly of the North Shore Waterfront Conservancy of Staten Island, Inc.

Reference: NSWC's Staten Island Gold Coast: 5.2 Miles from St. George to Arlington, Shore Up Community Resilience Adaptation Project for the North Shore of Staten Island.