Three Rivers Waterkeeper
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Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington DC 20460

February 18, 2025

RE: [EPA-HQ-OLEM-2024-0360; FRL 12146-02-OLEM] Title: Interim Framework for Advancing Consideration of Cumulative Impacts

To the United States Environmental Protection Agency,

Three Rivers Waterkeeper is writing to provide feedback on the Interim Framework for Advancing Consideration of Cumulative Impacts, as released by the United States Environmental Protection Agency (EPA) on November 21st, 2024. Three Rivers Waterkeeper (3RWK) was founded in 2009 and aims to improve and protect the water quality of the Allegheny, Monongahela, and Ohio Rivers. These waterways are critical to the health, vitality, and economic prosperity of our region and communities. We are both a scientific and legal advocate for the community, working to ensure that our three rivers are protected and that our waters are safe to drink, fish, swim, and enjoy. We monitor and patrol our waterways, and take samples of basic parameters using our own sampling device, E.coli samples, and specific parameters at external laboratories. We are one of the over 300 organizations that make up the global Waterkeeper Alliance and work together to connect local communities to global environmental and advocacy resources.

We commend the US EPA for researching cumulative impacts and planning to account for cumulative impacts when addressing pollution in our waterways and communities. As a waterkeeper, we spend hundreds of hours on the water each year monitoring and patrolling our waterways. We continue to document various types of pollution (coal ash, metals, volatile and semi-volatile organic compounds, E.coli, PFAS) all within the same area. Many of these pollutants are permitted discharges from industrial outfalls while others are exceedances or non-point sources of pollution. Because of this, we have major concerns about the combined impacts of different pollutants and the combined impacts of multiple facilities discharging the same pollutants. Historically, regulatory agencies have allowed large amounts of pollution from multiple facilities through the concept that “dilution is the solution to pollution.” However, it is important to take into account and fully assess the risks and impacts to communities and ecosystems from a whole system/watershed perspective to understand the real, holistic impacts of pollution on our waterways.

Cumulative impacts on waterways can lead to significant degradation in water quality, reduced aquatic biodiversity, altered river morphology, increased flooding potential, and disruption of ecosystem functions, primarily resulting from the combined effects of multiple stressors like pollution, land use changes, and infrastructure development within a watershed over time, causing a more severe impact than any single activity alone. The US EPA should consider the following in their cumulative impact assessments:

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- Nonpoint and point source pollution: Accumulation of pollutants from various sources like urban runoff, agricultural discharge, and industrial waste can significantly lower water quality, impacting aquatic life and human health.
- Land use and development: Land development activities like urbanization can lead to the destruction of riparian vegetation and alteration of stream channels, reducing available habitat for fish and other aquatic organisms.
- Water flow alterations: Dams, diversions, and changes in land use can disrupt natural water flow patterns, impacting aquatic species that rely on specific flow conditions.
- Vegetation Removal: Removal of vegetation along riverbanks and altered flow patterns can lead to increased erosion, impacting channel stability and sediment transport.

Cumulative impacts can lead to declines in fish populations due to reduced habitat, poor water quality, and increased stress from multiple stressors. The combined effects of various activities like agriculture, urban development, industrial discharge, and forestry practices within a watershed can accumulate across a large geographic area, affecting entire watersheds and interconnected water bodies. Furthermore, the cumulative effects can build up over time, with past activities contributing to present and future impacts.

We recommend that the US EPA require cumulative impact assessments for new, renewed, or amended NPDES permits. These assessments should consider and evaluate the multiple facilities discharging pollutants into the same watershed with an analysis of combined effects of the same pollutant which can lead to higher ambient levels of pollutants than a singular facility. The assessments should also consider the impacts of multiple types of pollutants interacting in the watershed which can negatively impact public and ecosystem health even if individual pollutant values may be “low”.

We recommend that the US EPA set limits to cumulative impacts exposure where no new permits will be issued in communities with high cumulative impacts or exposure from legacy and ongoing environmental contamination. In regions where industrial growth is necessary, the US EPA can mandate additional control technologies for all facilities in that community to minimize cumulative community health impacts to reduce the negative impacts on public and environmental health.

Thank you for your Time and Consideration,

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