TROUT UNLIMITED
CONSERVING, PROTECTING AND RESTORING NORTH AMERICA'S COLDWATER FISHERIES AND THEIR WATERSHEDS

MAD RIVER CHAPTER OF TROUT UNLIMITED INC.
A DOMESTIC NOT FOR PROFIT CORPORATION REGISTERED
UNDER THE LAWS OF THE STATE OF OHIO

Via: epa.dswcomments@epa.ohio.gov January 12, 2026

Ohio Environmental Protection Agency
Attention: Division of Surface Water
Permits and Compliance Section
P.O. Box 1049
Columbus, Ohio 43216-1049

Re: Draft NPDES General Permit for Discharges from Data Center Facilities to State Waters. NPDES Permit No. OHD000001, Public Notice No. 215991

The Mad River Chapter of Trout Unlimited (TU) submits the following comments on the draft NPDES General Permit OHD000001 for Data Centers.

Trout Unlimited is the nation's leading conservation organization working to care for and recover rivers and streams and their trout and salmon populations. We bring people together across the country to be champions for their rivers and help make our water cleaner and our communities healthier. Our TU chapter is actively involved in the conservation, restoration, and monitoring of coldwater resources in southwest and central Ohio, including the Mad River watershed. Chapter members conduct macroinvertebrate monitoring, habitat improvement projects, and public education focused on protecting water quality and aquatic life.

Antidegradation Determination

The Chapter is concerned by the draft permit's determination that:

"a lowering of water quality of various waters of the state associated with granting coverage under this permit is necessary to accommodate important social and economic development in the state of Ohio."

General NPDES permits are typically intended for discharges that are minor, repetitive, and expected to have minimal environmental impact. A statewide determination that water quality degradation is anticipated and acceptable for an entire industry is inconsistent with that purpose and undermines Ohio's antidegradation framework.

By applying this determination broadly instead of requiring individual permits, the permit eliminates site-specific review of impacts to individual watersheds, including high-quality and coldwater streams.

Impacts to Coldwater Resources

Data centers commonly discharge non-contact cooling water, cooling tower blowdown, and stormwater from large impervious surfaces. These discharges can cause:

- Thermal loading
- Reduced dissolved oxygen
- Altered flow patterns
- Degradation of aquatic habitat
- Loss of sensitive macroinvertebrate communities

Coldwater streams are particularly vulnerable to even small increases in temperature. Once thermal thresholds are exceeded, recovery is difficult and often irreversible. The Mad River watershed and other coldwater resources in Ohio are already limited and should receive heightened protection.

Cumulative and Watershed-Scale Impacts

The proposed general permit does not adequately address cumulative impacts where multiple data centers may be sited within the same watershed. Incremental increases in temperature and discharge volume can collectively cause significant degradation, even when individual facilities appear compliant.

A general permit structure limits the ability to evaluate these watershed-scale impacts before authorization is granted.

Recommendations

The Mad River Chapter of Trout Unlimited respectfully requests that Ohio EPA:

1. Reconsider the use of a general permit for data center wastewater discharges.
2. Require individual NPDES permits for large facilities or those discharging to high-quality or coldwater streams.
3. Include explicit exclusions or enhanced protections for coldwater habitat.
4. Strengthen temperature limits and monitoring requirements.
5. Require site-specific antidegradation review for discharges to Tier 2, Tier 2+ or Tier 3 waters.

Conclusion

Economic development should not come at the expense of Ohio's remaining coldwater resources. Clean water is a critical public trust resource and an economic asset in its own right. The Mad River Chapter of TU urges Ohio EPA to revise the proposed permit to ensure Ohio's streams are protected for future generations.

The draft permit correctly excludes discharges to Outstanding State Waters and direct tributaries within two stream miles of those waters and discharges to a receiving water with a seasonal salmonid habitat use designation, but we want to make sure any discharges to waters in the Mad River watershed are excluded from this general permit.

Respectfully submitted,

Trout Unlimited – Mad River Chapter

Stephen Moore, President