



Comments on Proposed Additional C1 Stream Designations

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New Jersey Future supports expanding the number of C1 designated streams in New Jersey, particularly in State Development and Redevelopment Plan Planning Areas 4 and 5 as these areas are intended for preservation and contain some of the state's most important natural resources.

While the proposed rule provides clear written descriptions of the streams receiving C1 designation, these descriptions are difficult to identify without intimate knowledge of a specific location. For this reason, New Jersey Future requests that the department provide a map identifying each C1 stream segment at an appropriate scale and with satellite imagery so that local stakeholders can understand the local impacts on development, redevelopment and preservation. We understand that the department has the skills and technology to perform this exercise fairly easily. Ideally, this map information would be available via link to the department's web page at <https://www.nj.gov/dep/rules/notices.html>

We are unable to determine the potential consequences of upgrading a stream designation to C1 where there is an existing wastewater facility discharging into that part of the stream, especially if serving Planning Areas 1 and 2. If a proposed designation would result in a requirement that a wastewater facility upgrade its facility significantly in order to be able to meet any new water quality standard, the department should identify such impacts and identify what the financial impact of that designation would be on the discharger. In these cases, we recommend that the department facilitate and prioritize the necessary funding for any required upgrades through close coordination with the New Jersey I-Bank, in order to minimize potential burdens for lower-income households and to ensure that such requirements do not create impediments to redevelopment that could ultimately improve the quality of the stream. To this end, the department should identify each instance where a stream designation upgrade will result in new requirements for specific wastewater facilities.