



Comments on

**Executive Order No. 23
Draft Guidance Document**

**New Jersey Department of Environmental Protection
Office of Environmental Justice**

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New Jersey Future is a statewide, nonpartisan organization that, among many efforts, advocates for strong and resilient communities and values equity as central to its mission and operational framework. We support Executive Order No. 23 and have reviewed the draft guidance document.

We appreciate the draft's action-oriented nature and specific next steps. We are also pleased that the proposed guidance includes explicit language that agency action plans should "improve conditions" and "maximize benefits for environmental justice communities."

However, we believe that the guidance can be made even more clear and effective by addressing the following:

- Include approximate timeframes for certain actions and milestones, including the frequency of Environmental Justice Interagency Council and Environmental Justice Advisory Council meetings as well as deadlines for final action plans, in order to foster agency accountability.
- Allow for public comment periods as agencies develop action plans in order to empower communities by seeking their input and engagement.
- Expand the list of state entities with one or more programs affecting environmental justice communities to make it more comprehensive. We believe that a reason should be provided for *not* including a state agency. We recommend including the New Jersey Department of Veteran and Military Affairs and the New Jersey Schools Development Authority because of their respective roles in potential environmental justice communities, including military installations and in school construction.
- Support cross-agency coordination as agencies develop training programs and action plans by delegating coordinating responsibilities to interagency liaisons.

We support the specific direction to create a lead exposure work group and note that under the auspices of Jersey Water Works, New Jersey Future has convened cross-sector experts including representatives from New Jersey's Department of Community Affairs, Department of Environmental Protection, Board of Public Utilities, Department of Children and Families, and Department of Health, as part of a lead in drinking water task force. New Jersey Future can be a resource on this issue along with the environmental justice issues of CSOs and flooding.

Thank you again to the department for facilitating a process to implement Executive Order No. 23 to serve the people of our state more effectively. We are supportive and appreciative of this process. For questions regarding these comments, please contact Brian Caycho.