



**Comments on
Draft Guide to CSO Public Engagement for New Jersey's Combined
Sewer Overflow Permits and Long-Term Control Plans**

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Thank you to the New Jersey Department of Environmental Protection (NJDEP, or the Department) for creating the draft Guide to CSO Public Engagement. We appreciate the opportunity to provide feedback on this important document that will hopefully assist permittees in engaging affected community members regarding combined sewer overflows (CSOs) and long-term control plans (LTCPs). This guidance document and regional permits are a step toward improving water quality and public health related to CSOs in New Jersey.

New Jersey Future (NJF) appreciates NJDEP's hard work and effort in creating this draft guide and the CSO permits, and supports guidance and permit requirements regarding public engagement. Public engagement guidance will provide permittees with the resources and knowledge to comply with permit requirements while engaging in outreach and engagement efforts that meet the specific needs of the community. This guidance provides the opportunity to share best practices and recommendations for permittees to meaningfully and effectively engage communities impacted by the environmental, social, public health, and economic effects of CSOs.

Overall NJF supports the draft Guide to CSO Public Engagement. However, we recommend that there is a more clear delineation between what is simply guidance versus a permit requirement in order to help permittees go beyond minimum requirements when engaging with the community. We also recommend that this guide provide additional information on strategies to engage with local businesses. Here are some areas that we think need clarification, and our recommendations:

Green Infrastructure Engagement:

NJF regards green infrastructure (GI) as an integral stormwater management practice and an essential climate-resilient solution that has benefits for CSO volume reduction and water quality improvement. CSO control alternatives, including green infrastructure, are important components of reducing combined sewage released during wet weather events. Our recommendations include:

- Include additional information on community benefits, such as the social, recreational, and public health benefits. NJDEP should provide recommendations on stormwater

experts, such as the Rutgers University Water Resources Program, who can educate the community on the benefits of green infrastructure which include CSO volume reduction.

- Provide permittees with additional information regarding grant opportunities for green infrastructure projects.
- Provide best practices and links to additional resources regarding green infrastructure project maintenance. The Guide suggests involving the community in the siting of green infrastructure projects. Community involvement is important to gather information on frequently flooded locations and the green infrastructure benefits most important to the community.
- Include Information on necessary maintenance required for Best Management Practices (BMPs), such as the recommended community-driven GI projects such as rain barrels, rain gardens, and bioswales.
- Provide minimum requirements for additional engagement opportunities outside of Supplemental Team Meetings for permittees to engage with affected communities and local businesses on green infrastructure implementation and maintenance.

CSO Supplemental Teams:

The CSO Supplemental Teams are valuable connectors for the community and local businesses and the permittee to make implementation decisions. We thank NJDEP for advising Supplemental Teams to inform the Office of Environmental Justice regarding meeting schedules to increase outreach. Recommendations include:

- Provide recommendations for permittees to engage members of all impacted communities. CSO Supplemental Teams are regional, so it is vital to ensure that areas impacted by CSOs have representation on these teams.
- Propose that meetings are rescheduled if a representative from each impacted community is unable to attend a Supplemental Team Meeting. It is important to include members from each impacted community when making important project implementation decisions.
- NJDEP's Office of Environmental Justice provides training for strategies to effectively engage with overburdened communities.
- Include additional groups, such as environmental commissioners, that should be involved in the Supplemental Team. This guidance suggests that stakeholders such as environmental groups, business, industry and redevelopment groups, and representatives of local government may be included in the Supplemental Team. These groups mentioned in the guidance should always be included in the Supplemental Team.
- Provide a recommended minimum number of Supplemental Team meetings.
- Provide additional information and resources for permittees to ensure that meetings are accessible, such as with language translators and by public transportation.
- Provide suggested meeting agenda topics to ensure that these issues are discussed. Suggested topics include: milestones and timeline updates; current and upcoming projects, green infrastructure siting opportunities and design, communicating the impact of current or future construction on neighborhoods and quality of life, identifying local flooding issues and possible solutions, current or new financing opportunities, tracking progress with public engagement in relation to measure of success, summary of public

and stakeholder comments, volume of CSO reduction and where those reductions are occurring, and for regional plans, project status that will have significant implications to downstream communities.

LTCP Outreach Coordinator:

The LTCP Outreach Coordinator will serve as an important bridge between the permittee and impacted communities. Recommendations include:

- Require a feedback loop so that Supplemental Teams and impacted communities understand how their feedback is being incorporated by the permittee into LTCP and permit projects and plans. Public engagement requires continual feedback from the CSO Supplemental Team and the affected community that is shared with the permittee. The LTCP Outreach Coordinator can facilitate this open dialogue so that the Supplemental Team understands how their feedback is being implemented by the permittee.
- LTCP Coordinator tracks the effectiveness of multiple engagement strategies to inform the permittee of the best methods that involve diverse stakeholders. This includes analyzing which forms of outreach are most effective in a given community.
- Provide training and professional development opportunities for LTCP Outreach Coordinators regarding CSOs, facilitation skills, and environmental justice.
- NJDEP provides best practices and resources for LTCP Outreach Coordinators to maintain and update the permittee's website to communicate LTCP implementation information.
- Encourage all LTCP Outreach Coordinators to meet regularly with NJDEP staff to learn engagement strategies from other coordinators that can be tailored based on the needs of the impacted communities.

Public Engagement Process:

The Guide to CSO Public Engagement provides the permittee with information on strategies to meaningfully and effectively engage with the CSO Supplemental Teams and the general public. Thank you to NJDEP for including the Environmental Protection Agency's (EPA) guidance on public engagement within this resource. This national guidance resource should be referenced continuously throughout the guide for permittees. Recommendations include:

- Provide permittees with information on experts that can increase meeting accessibility, including translators and facilitators that are experienced in engaging with overburdened communities.
- Encourage permittees to continually seek new strategies to engage the public, and to use community input to help inform LTCP implementation.
- Provide information to permittees on methods to engage local businesses.
- Recommend that permittees inform impacted communities of project timelines and make them aware of construction schedules and how this will impact road closures.

New Jersey Future thanks NJDEP for creating the Guide to CSO Public Engagement for New Jersey's Combined Sewer Overflow Permits and Long-Term Control Plans, which will provide valuable information for permittees to engage with CSO Supplemental Teams, community

members, and local businesses. We appreciate this opportunity to provide comments on the draft Guide to CSO Public Engagement.