

**Comments on NJDEP's Guide to CSO Public Engagement
Submitted on behalf of Jersey Water Works CSO Committee on July 28, 2023**

Jersey Water Works (JWW) is a collaborative effort of many diverse organizations and individuals who embrace the common purpose of transforming New Jersey's inadequate water infrastructure by investing in sustainable, cost-effective solutions that provide communities with clean water and waterways; healthier, safer neighborhoods; local jobs; flood and climate resilience; and economic growth.

JWW commends the New Jersey Department of Environmental Protection (NJDEP) for drafting the Guide to CSO Public Engagement. We appreciate the opportunity to comment on this guidance document which permittees can utilize to enhance their public engagement efforts to suit the needs of their specific community. The JWW CSO Committee respectfully submits the following comments and recommendations:

CSO Supplemental Team: We commend NJDEP for making the CSO Supplemental Team a requirement of the 2023 NJPDES CSO Permits. The role of the Supplemental Team is to be a conduit between permit holders and the general public.

1. The CSO Supplemental Teams will be regional—It is necessary to ensure communities are represented in these teams. The guidance should provide best practices for permittees to conduct outreach and engage with the affected communities.
 - a. NJDEP should build in a requirement for a minimum percentage of affected community members represented in the Supplemental Team.
 - b. The Supplemental Team should be a cross-sector representation from the community, in alignment with a particular community's makeup. Stakeholders such as community members from overburdened and impacted neighborhoods (as a priority), and also environmental groups, business, and representatives of local government should be included in the Supplemental Team. This guidance should also include local environmental commissioners and watershed groups.
2. Meeting frequency and attendance should be clarified.
 - a. Develop a minimum number of Supplemental Team meetings to be held annually.
 - b. Recommend that all meetings be held in a hybrid format to ensure as many community members are able to attend and that a call-in option be part of this for those without computers.
 - c. If impacted community members are unable to attend a Supplemental Team meeting, this guidance should recommend the meeting be postponed and rescheduled. Community members' involvement in the decision making meetings are of utmost importance in implementing project plans.
3. Meeting accessibility should be increased. We recommend NJDEP provide permittees with information on experts that can increase meeting accessibility, including translators, interpreters, and facilitators that have experience engaging with overburdened communities.
4. An agenda with recurring topics for each meeting should be required and included in the guidance to ensure the important topics are discussed including, project status, project impact on goals, public outreach and participation progress, etc.
5. The checklist should be modified to clarify what is required versus what is encouraged.

LTCP Outreach Coordinator: The LTCP Outreach Coordinator will serve as the communicator

between the permittee, public, and other interested stakeholders throughout the LTCP implementation process.

1. Concurrently release a training manual for selecting and onboarding a new LTCP Coordinator, including the skills, experience, and certifications required to be successful in the role.
 - a. Necessary skills and experience should include an understanding of community engagement best practices and previous success in that work.
 - b. We recommend that the LTCP Coordinator be a member of the local community.
2. NJDEP should provide specific training so that there is a shared understanding amongst the LTCP Coordinators.
3. A feedback loop that demonstrates how community knowledge and awareness is incorporated into the permit projects and plans should be established. The LTCP Coordinator could take on this responsibility.

Green Infrastructure Engagement:

1. We suggest NJDEP provide recommendations on stormwater experts, such as the Rutgers University Water Resources Program, who can educate the supplemental teams and community on the benefits of green infrastructure which include CSO volume reduction. The guide should include additional information on community benefits, such as the social, recreational, and public health benefits.
2. The guide recommends educating the public on the benefits of green infrastructure. We recommend NJDEP provide guidance on how to first educate the community, with a focus on the community benefits, such as providing green space, reduced flooding, and stormwater management.
3. The guide also suggests involvement of the community in the siting of green infrastructure. In addition, the education guidance should also include information on how to identify frequently flooded locations most suited for green infrastructure practices.
4. The guide encourages community-driven green infrastructure initiatives such as rain gardens, bioswales, and green roofs. NJDEP should create a system of enforcement to ensure that these green infrastructure practices are maintained.

Overall, we recommend NJDEP clearly delineate between what is guidance/recommended versus a permit requirement to help permittees go beyond minimum requirements.

The JWW CSO Committee thanks the NJDEP for developing the Guide to CSO Public Engagement for New Jersey's Combined Sewer Overflow Permits and Long-Term Control Plans, which will help permittees engage with their communities.

Sincerely,
Jersey Water Works CSO Committee

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