

Comments on the NJDEP Strategic Climate Action Plan
Submitted on behalf of the Jersey Water Works Climate Resilience and Green Infrastructure
Committees

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 or the Department) for drafting the Strategic Climate Action Plan. We appreciate the opportunity to comment on this strategic document that addresses the impacts of climate change and the increasing need for resilience. The JWW Climate Resilience Committee respectfully submits the following comments and recommendations:

MS4 Permit Training Requirements: We commend NJDEP for updating the Tier A Municipal Separate Storm Sewer System (MS4) permitting process to include current, innovative measures for reducing stormwater pollution through implementing the One Water Initiative. The Committee poses the following questions for consideration:

- How are Stormwater Pollution Prevention Plans (SPPPs) currently reviewed/audited? How does NJDEP plan to enforce updates and implementation of SPPPs?
- How does NJDEP plan to confirm training completion of Stormwater Coordinators? How often do they have to be trained?
 - Increase capacity at the Department to review and audit Stormwater Pollution Prevention Plans for information regarding training for municipal staff responsible for the stormwater program to ensure that all employees and council members receive appropriate training.
- NJDEP provides guidance to MS4 permittees for information and resources to include in their stormwater training.
- Provide a list of Stormwater Program Coordinators that have completed NJDEP's required training program.
 - Can MS4 permittees provide proof of training completed on their dedicated municipal stormwater webpage similar to how they are required to include SPPPs?

Capacity Issue for Local Municipalities: We recognize that municipalities must take proactive steps to consider and plan for the impacts of climate change; however, the Committee recommends the following:

- The DEP can offer a technical assistance program similar to the Stormwater Utility feasibility study grants that provides municipalities with an expert consultant team.
- The DEP can offer funding for capacity building similar to the Tier A Stormwater Assistance Grants to increase municipal climate resilience.
- There are tools that have been developed by the US Environmental Protection Agency, National Oceanic Atmospheric Administration, US Army Corps of Engineers, Rutgers University, etc. that may be helpful for local municipalities to utilize. Could the NJDEP

generate a list of resources and tools that are currently available and may help municipalities plan for the impacts of climate change?

- How will NJDEP prioritize and encourage regional climate mitigation and adaptation solutions?
 - Partnerships with local watershed associations and government agencies can assist regional watershed planning, as climate change impacts do not follow municipal boundaries.

Resilient NJ Pilot Program: We commend Resilient NJ as a great model for partnering with local groups on climate resilience; however, the Committee recommends the following:

- Can NJDEP prioritize the need for local interpreters, so interpreters can be hired for non-english speaking communities involved in community outreach efforts?
- Prioritize resilience programs in locations that need capacity building like Atlantic City or Perth Amboy.

Environmental Justice Communities: We commend and recognize the inclusion of a Climate Equity section in the plan; however, the Committee recommends the following for the Resilience section:

- Environmental Justice (EJ) communities and resilience need to be better aligned. The Department should prioritize resilience projects and assistance in EJ communities that often have outdated infrastructure that is not able to withstand severe climate impacts.
 - NJDEP should emphasize and prioritize green infrastructure and other nature-based solutions in EJ communities to increase their climate resilience. While gray infrastructure is needed, both green and gray solutions should be explored simultaneously as green infrastructure will also address health concerns experienced by EJ communities.
 - Can NJDEP help facilitate community engagement that involves municipalities, local advocacy and community groups, and nonprofits? It is important to include the whole community when identifying locations and planning for green infrastructure implementation, so as not to cause displacement of current community members when implementing new green and gray projects.
- There needs to be an expedited permitting process for redevelopment projects in Environmental Justice communities in order to address resilience. We encourage NJDEP to include expedited permitting considerations into the upcoming Resilient Environments and Landscapes (REAL) rule proposal.

The JWW Climate Resilience and Green Infrastructure Committees thanks the NJDEP for developing the Strategic Climate Action Plan to address the increasing impacts of climate change.

Sincerely,

Jersey Water Works Climate Resilience and Green Infrastructure Committees

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