

## Comments for Newark's CSO Long Term Control Plan

From Crystal Wessel, NJ Tree Foundation

- Being more specific with short-term goals and creating a more detailed timeline would be helpful
- 5% Green Infrastructure does not accurately reflect what the public wanted - GI is relatively inexpensive and has benefits to the community beyond stormwater, so it should be a more significant part of the plan. Private property could be incorporated in some way, possibly by offering incentives such as rebates for residents to add GI projects (rain gardens, rain barrels, etc) to their yards.
- Public participation should continue throughout the duration of the plan in a more active way than having a Supplemental Team - holding meetings in the areas where projects will take place is critical as the public shouldn't be left behind in decision making.
- Any disruptive projects should be cleaned up entirely when finished, and produce a tangible difference. Residents expressed that they were okay with disruptions as long as it resulted in a significant, visible improvement.
- It is very likely that the rate increase may be unaffordable for Newark residents. High cost of living and low incomes, compounded by COVID-19 issues, may result in many residents not being able to pay. A Customer Assistance Plan should be put in place, as well as different rates based on income level.
- A rate increase based on the amount of impervious surface should be considered. There are many companies with large amounts of impervious surfaces through buildings and parking lots, contributing to large amounts of runoff, but they currently do not pay any stormwater fees. Requiring them to pay based on the amount of impervious surface they own would help to ease the burden on residents and be more fair since these companies are contributing more to stormwater issues.
- There should be a focus on using local contractors for construction projects.
- There should be focus on making waterfronts more accessible, especially for high-need communities.
- While the current plan maintains current water quality levels, it still will not create swimmable waters. There should be attempts to improve water quality, not simply not degrade it.
- Outreach should be done to upstream communities even if they are not CSO communities - these municipalities still have an impact on Newark's water.