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Dear Assistant Commissioner Gardner, Director Brogle, Bureau Chief Rosenwinkle, and CSO Team Lead Kobesky,

Perth Amboy SWIM (Stormwater Infrastructure Management) is a collaborative organization, supported by the City of Perth Amboy, that meets to discuss and find solutions to stormwater issues in Perth Amboy. Our members have been involved in and attentive to the process surrounding the development of the CSO Long Term Control Plan (LTCP) for Perth Amboy by attending Supplemental Team meetings and communicating questions and concerns with CDM Smith and Luiz Perez Jimenez as often as possible. The following comments refer to the Selection and Implementation of Alternatives Report (SIAR) for Perth Amboy, are organized by area of concern, and have been agreed upon by the members of SWIM. We thank you for your attention to our concerns.

Sincerely,
Perth Amoy SWIM*

*Members: Raritan River Keeper, Royal Garden Club of Perth Amboy, New York/New Jersey Harbor Estuary Program, Raritan Bay YMCA, Lower Raritan Watershed Partnership, Perth Amboy Civic Trust, Perth Amboy DPW, Perth Amboy City Council, New Jersey Future



Water Quality

- The report acknowledges that the beaches in Perth Amboy are not designated as sensitive areas, and are therefore not bathing beaches, but does not describe how the LTCP will, if at all, lay the foundation for improving water quality conditions to allow bathing and establish our beaches to NJDEP “primary contact recreation” designated sensitive areas.
- There have been studies on the bacterial concentrations in the Raritan River around Perth Amboy, but these have not been considered or recommended for further investigation in the SIAR. These studies may be useful in determining how effective the LTCP will be in reducing bacterial concentrations in receiving waterways.
- The cleaning of sewers and lining sewers where severe inflow and infiltration impacts are observed was not listed as a priority action, even though this would likely increase in-line capacity and is a relatively low-cost option.

Environmental Justice

- The Selection and Implementation of Alternatives Report says nothing specific about Environmental Justice, even though Perth Amboy is an Environmental Justice community as defined by the EPA and the NJDEP.
- The report does not acknowledge that even though it is not a designated bathing beach people still regularly swim in it and may be suffering the impacts of pollutant exposure during CSO events.
- It is implied that alleviated CSOs will provide relief to Environmental Justice communities, but the payment plan is not feasible for residents of Perth Amboy to be able to implement the plan.
- The community has not been engaged in the planning process enough thus far, as meeting advertising and information that has been shared has dwindled over time.
- We would like to see a plan for how the LTCP is going to affect Perth Amboy from an Environmental Justice standpoint.

Green Infrastructure (GI)

- No specific locations are identified, but 48 acres or 10% of runoff from impervious areas is stated as the goal for GI to manage. The DEP has asked for percentage/volume of overflows reduced by GI to be described instead of impervious area treated. The report should describe why 48 acres is the target, and how this translates into volume of CSO reduced.



- The report states that the first two years of the LTCP implementation will be used to develop a GI plan through analysis but does not describe any plan for how the GI plan will be developed or who will be included in the planning process.
- Ideally, a green infrastructure suitability analysis would be done using land use and rainfall data to find best locations for GI, in the context of where CSO overflows are located (ie: how can CSOs 16, 19, and 3 be alleviated by GI; would it be better to focus GI on smaller flow CSOs; who could be consulted and involved in the design and construction to reduce costs as much as possible). No elements of the proposed GI analysis are outlined in the report.
- The report also states that the GI implementation work will be carried out through 2060, but does not explain why this implementation will take so long. This seems like an extraordinary amount of time to complete and implement GI practices in the city.
- Some of the ancillary benefits of GI are described in the report, such as rain gardens which improve habitat and provide aesthetic benefit, but the economic benefits as well as the social/health benefits are not detailed. The economic aspect would have been most beneficial to highlight.
- We would like to see a breakdown of what types of GI projects will be implemented for each 5 year permit cycle in the LTCP and the goals for how much CSO volume will be managed by each project

Financing

- The Perth Amboy SIAR financial capability analysis assumed that rates for residents would increase based on 2% of the median household income, but this does not consider lower income households, who would be unfairly burdened.
- The analysis should consider looking at the 20th percentile of earners, representing those earning less than median household income, and creating a stagger rate increase plan.
- Using their analysis, residents are looking at increasing rates by enormous and unrealistic amounts over the next 40 years – monthly bill increasing from an average of \$330 to \$1100
- A stormwater fee program should be recommended in the SIAR, so that those who own properties with large amounts of impervious surfaces are fairly charged for their contributions to the system
- The report does not acknowledge statements from residents which were made during supplemental team meetings, that claim some residents are paving and selling parking spaces in their yards. If there was a proposal to manage this issue it could help with reducing impervious cover.



Climate change

- There is no mention of how climate change may impact the proposed solutions and the locations of these solutions.
- One of the plan elements is to construct underground storage around the Sadowski Parkway which is right at the beaches. How has sea level rise, flooding, and watertable fluctuation impact been considered to ensure the successful implementation of this control?
- There should be a plan to identify a new design-storm year that will remain applicable for the next 2 decades, or a requirement to use new data as it is gathered to verify that the design year is still applicable.
- MCUA needs to be more resilient against climate change/storms that may be more severe and potentially cause power outages or service issues that could impact Perth Amboy's sewer services.
- Flooding occurs in the area owned by Port Authority near the Outerbridge Crossing and refinery area, where the state street pump station is located. How are the pumping stations in Perth Amboy being protected against sea level rise/storms?

Public Participation

- During the development of the LTCP, the city was mainly represented by Luis Perez-Jimenez, a Perth Amboy resident who works for Middlesex Water as the Director of Operations for the Perth Amboy water and sewer utilities. To broaden city representation, a city employee and/or a member of the city council should also be consulted during LTCP implementation
- Though there was a mention of a website which would be published to allow residents to learn and ask questions about the CSO's and LTCP, no party provided the website for public to use.
- Flyers were not distributed in enough quantity to hand out at community events, or flyer templates were not sent to parties which could have printed them, even when asked.
- City did not have capacity to distribute information and generate interest within the public, so the lack of understanding within the residential community makes meaningful discussion difficult.