

SEWAGE FREE STREETS AND RIVERS

Sewage Free Streets and Rivers

Advisory Board

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SewageFreeNJ.org

To:

Gregory A. Tramontozzi, Esq., Executive Director Passaic Valley
Sewerage Commission
Board of Commissioners Chairman Thomas Tucci, Jr.
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We, the undersigned members of the Sewage-Free Streets and Rivers campaign, a coalition of community organizations from towns with combined sewer systems, are writing to request that you recognize the full hydrological benefit that the regional combined sewer overflow (CSO) Long Term Control Plan will create, and ensure that the cost for these upgrades is shared equitably between the PVSC and the 48 towns within the service area, including the municipal CSO permit holders (Newark, Jersey City, Bayonne, Harrison, East Newark, Kearny, Gutenberg, and Paterson).

The proposed regional plan calls for the municipal CSO permit holders to spend hundreds of millions of dollars to upgrade their own sewer systems and to share the cost of the \$219 million regional parallel interceptor upgrade. This upgrade will result in a benefit to the full hydrologically connected system, not just the municipalities with CSOs. Just as the benefits of clean waterways, reduced flooding, and more capacity at the sewer treatment plant will be shared, the cost for this regional interceptor upgrade should also be distributed among all 48 municipalities within the PVSC service area, with the exception of the City of Newark.

Newark is the host city of the PVSC treatment facility and already suffers a disproportionate burden from the pollutants, odors, and traffic associated with the sewer treatment plant over and above the regular sewage overflows from CSOs and the cumulative impacts of other

industries located within the city's limits. The construction of the interceptor will add pollution effects to these cumulative impacts, increase the flow ending up in Newark, and cause years of disruption to daily life for Newark community members. These concerns should all be considered in allocating the costs of this plan with a reduced rate for Newark.

Although the entire region does not have combined sewer systems, we know that communities with separate sewer systems also contribute to the increase in wet weather flows when it rains. During wet weather events, all up-system communities contribute to PVSC's daily load, but when the valves are shut off, it is the communities with combined sewer systems that suffer (especially Newark, which is located at the end of the line). A regional approach to solving sewage overflows must also be truly regional when developing a cost-sharing plan, as well.

Furthermore, we ask that you consider the environmental justice impacts of these plans in light of the benefits of reducing combined sewer overflows for the region, the necessary associated construction harms the plans require, and who will ultimately be impacted by the costs. The proposed plan unfairly burdens economically distressed communities with rate increases and extended timelines. The result is that residents in these communities will be paying higher sewer rates while enduring the impacts of CSOs for years to come. Under current plans, some may not see the benefits of CSO reduction for 30 to 40 years.

Communities with CSOs have already suffered from the injustice of having sewage in their streets and rivers, and now they are being asked to shoulder the entire cost of these plans. We ask that you, as commissioners of the Passaic Valley Sewerage Commission, stop this injustice and ensure that the costs are shared both among the economically distressed and more affluent municipalities in the service area. Additionally, PVSC should give proper and due consideration to offering the City of Newark a host fee and/or a reduced allocation of cost for its role in hosting the water treatment facility.

As the governing body of one of the largest sewer treatment plants in the United States, the PVSC commissioners are not only responsible for "alleviating pollution in the Passaic River and its tributaries" but also for "enhanc[ing] the viability, environmental health, and security of the 1.5 million residents in the 48 municipalities of Bergen, Essex, Hudson, Union, and Passaic Counties of the Passaic Valley Service District." Reducing combined sewer overflows is a major part of PVSC's mission as a regional utility working to achieve the goals of the federal Clean Water Act. The benefits of the CSO Long Term Control Plans will be felt far beyond the borders of the eight communities with combined sewer systems, and the costs should be similarly shared.

Sincerely,

Jennifer Coffey, Executive Director,
Association of New Jersey Environmental
Commissions (ANJEC)

Munirah Bomani El, Newark Advocate,
Black Human Rights Campaign-Newark

Amy Goldsmith, NJ State Director,
Clean Water Action

Dawn Giambalvo, President,
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Rosalyn Waters-Maxwell, President,
Combined Warner Avenue Block
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Great Swamp Watershed Association

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For more information contact Michele Langa, NY/NJ Baykeeper at michele@nynjbaykeeper.org.

Cc:

Shawn LaTourette, NJDEP Acting Commissioner, NJDEP

Olivia Glenn, Deputy Commissioner, NJDEP

Katie Angarone, Associate Commissioner for Science and Policy

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Patricia Gardner, Assistant Commissioner Water Resource Management, NJ DEP

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Susan Rosenwinkle, Bureau Chief, NJ DEP

Thomas Laustsen, Chief Operating Officer, Passaic Valley Sewerage Commission

Jose R. Cunha, Executive Director, Jersey City Municipal Utilities Authority

Tim Boyle, Executive Director Municipal Utilities Authority, the City of Bayonne

Kareem Adeem, Director of Sewer and Water, City of Newark

Steven Marks, Business Administrator, Kearny

Della Fisher, Chief of Staff, City of Paterson

Ras Baraka, Mayor, City of Newark

Steve Fulop, Mayor, Jersey City

James Davis, Mayor, Bayonne

Alberto Santos, Mayor, Kearny

Andre Seyagh, Mayor, Paterson

Wayne Zitt, Mayor, Guttenberg

Dina M. Grillo, Mayor East Newark

Nicholas Sacco, Mayor, North Bergen