



# SEWAGE FREE STREETS AND RIVERS

Your Waterways, Your Neighborhood, Your Money, Your Voice

October 3, 2022

**To:**

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On behalf of the Sewage-Free Streets and Rivers (SFSR) partners, we are submitting the following comments on the proposed amendments to allocate \$300 million in federal American Rescue Plan funding through the Final Intended Use Plan (IUP) for FFY 2022 and SFY 2023. The [Sewage-Free Streets and Rivers campaign](#) is a coalition of community and advocacy organizations that are based in and work with communities with combined sewer systems.

SFSR Members appreciate the New Jersey Department of Environmental Protection's (NJDEP) progress in proposing amendments to the Intended Use Plan to allocate the \$300 million that was included in the FY23 State budget. This funding for water infrastructure projects is a win for residents who live in communities with combined sewer systems and for the health of New Jersey's families, our state's economy, and affordability.

We support the overall approach allocating the majority of funds for overburdened communities and principal forgiveness loans in the Clean Water IUP for Combined Sewer Overflow (CSO) projects. We appreciate that NJDEP is soliciting comments on the amendments and submit the following recommendations:

1. We recommend that the NJDEP start to release the draft CSO permits and provide a timeline for when the remaining draft permits will be released. Although CSO projects are eligible for funding through the IUP before the CSO permits are released or Long Term Control Plans are approved, uncertainty on the timeline for the CSO permits may delay the submission of projects for funding by CSO permit holders.

2. Financial assistance should be scaled to reflect environmental challenges, fiscal distress, and the potential burden that is projected for residents. Currently, a community with a smaller cost per resident may access as much funding as a municipality with higher needs. Further consideration should be given to scaling financial assistance to needs.
3. NJDEP should provide technical assistance to under-resourced and low-income communities to ensure that projects are ready to be submitted for funding. What type of technical assistance will the NJDEP be providing permit holders who serve overburdened communities to ensure that they are able to access these funds?
4. NJDEP should inform under-resourced municipal permit holders that they will work with them to apply for funding. In addition, a portion of the funding available through the IUP should be made available through grants for planning and design projects for under-resourced permit holders. Planning and design grants now can help permit holders apply for Clean Water State Revolving Funds in future years.

As you know, New Jersey's water infrastructure needs exceed the funding available. Additional funding is needed to ensure that clean water is safe and affordable for New Jersey communities.

Thank you for this opportunity to submit comments on the proposed IUP amendments. These comments were developed by members of Sewage-Free Streets & Rivers to ensure a healthy environment for New Jersey communities and residents. For more information, please contact Moriah Kinberg at [mkinberg@njfuture.org](mailto:mkinberg@njfuture.org). Thank you for your consideration.

**Respectfully signed by Sewage-Free Streets and Rivers member organizations and individuals,**

ANJEC, The Association of New Jersey Environmental Commissions  
Embankment Preservation Coalition  
Future City Inc, Michelle Doran McBean  
Greater Neighborhood Alliance  
Hackensack Riverkeeper & NY/NJ Baykeeper and Sewage-Free Streets and Rivers Advisory  
Committee Member, Michele Langa  
Ironbound Community Corporation  
Karla Mercado  
La Casa de Don Pedro  
Martha Arencibia  
Morris Park Neighborhood Association, Jill Scipione  
New Jersey Future  
New Jersey Tree Foundation  
Newark DIG (Doing Infrastructure Green)  
Pershing Field Park Neighborhood Association  
Raritan Riverkeeper, Bill Schultz  
Resilience Adventures, Noelle Thurlow  
Riverview Neighborhood Association  
Sewage-Free Streets & Rivers Advisory Committee Member, Jose Amarante  
South Ward Environmental Alliance, Kim Gaddy  
The Center For Environmental Transformation, Angel Perez  
The Passaic River Coalition