

PASSAIC RIVER COALITION
at Willow Hall

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Via Email dwq-bswp#dep.nj.gov

TO: Susan Rosenwinkle, Bureau Chief,
Bureau of Surface Water and Pretreatment Permitting, NJDEP
And Nancy Kempel, Dwayne Kobesky, Joe Mannick, Marcus Roorda
Patricia Gardner, Assistant Commissioner, Water Resource Management, NJDEP
Janice Brogle, Director, Division of Water Quality, NJDEP

FROM: The Passaic River Coalition

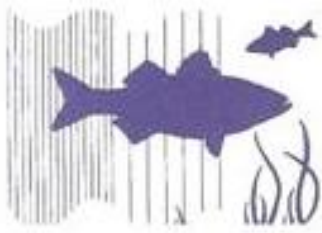
RE: Comment on 2022 CSO draft permit for Guttenberg and North Bergen Municipal Utility Authority

The Passaic River Coalition, with its fifty -year mission to protect our New Jersey waters in the Passaic Basin, has been a stakeholder on the CSO permitting process mandated for the twenty-one communities in need since its inception years ago. We thank NJDEP for its efforts to move forward this complicated, many-layered process, as it is a great challenge that finally will benefit so many of our citizens with compromised sewage issues in their communities.

The first draft permit now on the table is certainly the beginning of the next stage for all the permittees. We have worked and signed on with other stakeholders such as Sewer Free Streets and Rivers, Jersey Water Works, etc. and continue our work in explaining the process and encouraging public engagement to various communities that truly are being impacted even more than ever by compromised CSOs that are flooding into homes, schools and businesses. Undertaking this process in the most highly populated and built-up industrial cities in Northern New Jersey is a tremendous task.

Given this first public comment period for Guttenberg and North Bergen, we would like to emphasize the critical importance of public engagement to the health and welfare of and suggest some ways that the permittees, guided by NJDEP, need to connect to their constituents continually during the process at hand.

One suggestion for immediate and ongoing public outreach that comes to mind is for water utilities to target updates to each community through their billing mailings and emails. While this does not reach all within any given community, it is an important component to getting the word out on a regular basis. Explain what a CSO is, what is in the works, how can one engage directly and learn about the impact upon



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their specific neighborhood. In having such information posted in every billing invoice, people will take note; this generates “word of mouth” among a sector of each community. Much more is needed of course but this is a simple task that permittees can do easily through their billing process.

We do concur that a proposed LTCP Coordinator who oversees a dedicated website and social media for each permittee must be in place as an on-point resource for specific towns and their respective neighborhoods that will be impacted by CSO work in upcoming years. Overburdened communities especially are in need of assistance here and outreach to inform and secure engagement should include schools, businesses and house of worships that serve diverse populations. Audio, visual and written materials in specific languages are demanded here.

Finally, for those communities who are in the throes of sudden CSO flooding now from more frequent and intense rainfalls, the permittees must collect data on sewage connect and specific locations where this is now occurring and increasing. Municipalities need to be prepared, on the ready, to alert these neighborhoods to their vulnerability and assist them. When homes and streets flood from CSOs, often those residents are unaware of the sewage and health risks. It is imperative that the permittee make special efforts to recognize the hazards in these locations, engage these vulnerable residents in preparedness and understanding the plans of their LTCP in their respective neighborhoods. Internal state co-ordination with EJ and OEM agencies would especially foster a much more team-oriented approach to serving overburdened communities. Additionally, these sewage flooding areas should be placed on highest priority to remedy for any given LTCP.

Finally, some of today’s CSO problems have accelerated from decades of neglect in sewer maintenance. Cleaning all sewers on a regular basis in order to maximize wet weather storage and conveyance must be ongoing and include an affirmative certification of the cleaning by NJDEP. The permit must clarify compliance criteria and elucidate endorsement accountability so that permittees are subject to serious consequences if they do not comply with annual sewer maintenance.

We hope you consider our comments here for this and forthcoming permits. We thank you for your time and consideration, as always.

Sincerely,

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