

A joint Jersey Water Works committee comprised of the Asset Management & Finance Committee and CSO Committee have developed the following suggestions to ensure that the CSO Long Term Control Plans (LTCPs) are conceived, implemented, and funded in a manner that maximizes the benefits to underserved and environmental justice communities:

1) **Conception and Implementation**

Plans must prioritize consideration of the reduction of CSO impacts on underserved communities both in the timing of implementation and in the plan. The timing of implementation should be arranged in favor of addressing CSO impacts in underserved residential communities as a first priority to the maximum extent possible. In parallel with plan implementation, the DEP should also focus on effective compliance with the [Nine Minimum Controls for CSO systems](#), especially the cleaning of sewers and especially in underserved residential areas.

2) **Funding**

CSO communities should utilize the NJ Infrastructure Bank (NJIB) funding wherever possible since its lower interest rates and longer payback periods represent the most cost effective way of financing green and grey CSO improvements. Using NJIB funding will improve the affordability calculation that is critical to implementation of the LTCPs. In addition, CSO communities might benefit from implementing a stormwater fee. This would either add additional revenue from significant owners of impervious surface to offset the cost of implementing the LTCP and/or encourage owners of impervious surface to reduce their CSO contributions thereby reducing the overall cost of implementing the LTCPs.

3) **Financial Capability Assessment**

If CSO permittees choose not to utilize the beneficial NJ Infrastructure Bank funding or a stormwater fee to reduce costs and increase revenues, then they are making it more difficult, from the point of view of affordability, to implement the required LTCP improvements as quickly as practicable. Further, it is important for financial affordability analyses to consider affordability for low-income customers, not only customers with median household income. In doing so, CSO permittees should be expected to consider the above and other means to reduce the burden of investments on low-income customers. This could include changes in their underlying rate structures to be more equitable or use of low-income discounts to the extent allowed by law. Ultimately, the goal should be to mitigate the burden on low-income customers without extending the implementation timeline longer than necessary or reducing the level of CSO controls achieved through their plans.

Note: These suggestions are currently being reviewed by the NJDEP Environmental Justice Advisory Council as well as NJDEP Division of Water Quality officials.