



Re: Draft Water Supply Plan Comments on behalf of the League of Women Voters of New Jersey

The League of Women Voters is a public interest organization, whose guiding principle is the active and informed participation of citizens in government.

The League of Women Voters is pleased that after two decades a new Draft Water Supply Management Plan (WSMP) has been presented. However, we are disappointed that it reads more like a report of our current situation than a plan for the protection of our water supplies. We believe this Draft has some serious shortfalls which need to be addressed before a final plan can be adopted.

First, there is no acknowledgement of who participated in the drafting of this plan, as there was in the 1996 WSMP. Readers have no access to sources for this report, except for the articles referenced in the index. In the 1996 Master Plan there was a full page of acknowledgements that included members of the Water Supply Advisory Council, Public Advisory Committee, and NJ DEP co-authors. More transparency is critical for a plan that is of this importance to the health and well-being of our residents.

There is no mention anywhere in the plan of Climate Change, perhaps the world's greatest challenge. Climate change will put new strains on efforts to protect our water supply, from evaporation from reservoirs to increased periods of turbidity and pollution of streams and rivers due to flooding and run off from heavy storm events. There is only mention that the world temperature is getting warmer. Flooding, which occurs more frequently now, must be addressed in a more emphatic manner.

The League takes issue with the Department's definition of drought and its reference (p. 45) to "temporary and unusual droughts occurring worldwide" as though they are insignificant. In fact, many countries are experiencing severe, long lasting droughts that have killed millions and have undermined their food supply and agriculture. This section should be stricken from the WSMP report.

The fact that New Jersey must frequently deal with drought conditions is the very reason more watershed, wetland, flood plain, and flood fringe protection is needed and, in fact, this should be one of the main focuses of the Water Supply Master Plan. In the last two years the DEP has proposed rule changes to the Flood Hazard Control Act, the Coastal Area Facility Review Act (CAFRA), and the Freshwater Wetlands Act that would result in weaker protective measures. In addition, the report promotes the purchase of more watershed areas but provides no specifics.

The League opposed the adoption of these rule changes, not only because of weakened protections but also because they were written without the benefit of a current Water Supply Master Plan. The League is pleased that the Department is finally undertaking an update of the decades old Plan but is concerned about the lack of coordination between the above referenced rule changes and the new WSMP.

This draft plan references lessons learned from Hurricane Sandy but provides no recommendations for applying those lessons to watershed management. In fact rule changes to the Flood Hazard Control Act, which reduce buffers and other flood plain protections while also reducing DEP enforcement and oversight, are at odds with any real attempt to prevent damage from flooding. Furthermore, reference to the existing Stormwater Regulations should have been included in this Draft.

The 1996 WSMP wisely divided the state into 20 Watershed Management Areas (WMAs). It also called for a broad partnership to protect surface and ground water supplies. This included representation from the DEP, health departments, elected officials, and environmental and public interest groups such as the League of Women Voters of New Jersey. The Plan provided a budget and a comprehensive avenue for improvements to water quality, water supply, sound land use planning and most importantly, education of residents. As a result, the people most affected had input within their watershed areas as studies commenced and plans were developed.

Over time, however, the State reduced its staff and these Management Areas became inactive. Deep cuts were made in the Watershed Division of the DEP and more attention was paid to organizational structure than to the goals of watershed management. Not emphasizing watershed management in this WSMP is a serious shortcoming. We believe the state should reinstate WMA funding. Real progress was made during those years.

The Draft states correctly that there is a great need for repair of New Jersey's water supply infrastructure. Years of neglect have taken their toll. Currently, there are insufficient funds and some municipalities are turning to privatization as a way to pay for repairs. The League believes this solution is shortsighted. Privatization, where profit motives become more important than community oversight, is not the answer. Water is still the biggest bargain in New Jersey. Residents need more education to understand that pipes need repairs, tests need to be made, and qualified employees need to be hired in order for a supply of clear, pure water to come out of the tap. Watershed management can help with this education.

In summary, while the League is pleased the DEP is attempting to update the state's 21 year old Water Supply Master Plan, we do not believe this particular report accomplishes its stated goal. New Jersey needs a comprehensive, forward looking water supply management plan, not a summary of what has happened in this state over the last two decades.

Submitted by: Nancy Hedinger, President, League of Women Voters of New Jersey